COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

New England Telephone and Telegraph Company, d/b/a Bell Atlantic – Massachusetts Section 271 of the Telecommunications Act of 1996 Compliance Filing	))))	DTE 99-271

RHYTHMS LINKS INC. MOTION FOR RECONSIDERATION OF ORDER ADOPTING PERFORMANCE ASSURANCE PLAN

On September 5, 2000 the Massachusetts Department of Telecommunications and Energy ("Department") issued its Order Adopting a Performance Assurance Plan ("PAP") ("*Order Adopting PAP*") in the above-captioned proceeding. For the reasons stated below, Rhythms Links Inc. ("Rhythms") moves for reconsideration of the Department's Order.

I. INTRODUCTION

In its *Order Adopting PAP*, the Department adopted Verizon-Massachusetts' ("VZ-MA's") proposed PAP[1]—which is essentially identical to the PAP initially adopted in New York. However, as Rhythms indicated in its joint comments with Covad Communications Company ("Covad"), the New York PAP "does not adequately deal with all relevant DSL issues."[2] The New York PAP does far too little to promote non-discriminatory treatment that will make full competition in the provision of DSL services a reality. For example, in the current New York Plan, Verizon's wholesale performance with regard to DSL services is measured by

[1] With certain minor modifications. Most of the modifications to the VZ-MA proposal ordered by the Department merely rejected VZ-MA-proposed modifications from the New York Plan. *See, Order Adopting PAP*, at 23-35 (establishing the financial liability at $142 million; adopting a 95% confidence interval; adopting the modified MOE weights that the New York Commission adopted in February 2000; rejecting VZ-MA's proposed change to the statistical methodology used in New York; striking the VZ-MA provision which would allow VZ-MA to seek a waiver for "unusual" or "inappropriate" CLEC behavior; directing that annual audits remain mandatory; ordering VZ-MA to create a separate Massachusetts CCAP fund.)

only four metrics, all contained within the Critical Measures subgroup. Of these four metrics, two are not supported by any Verizon data.[3] A new Method of Entry ("MOE") category geared toward DSL issues, as well as additional Critical Measures covering DSL, is needed to ensure the proper development of the market for DSL services in Massachusetts. Therefore, the Department should reconsider its Order because, while the New York PAP is a good staring point, it currently is not sufficient to fully and effectively detect and deter discriminatory provisioning of DSL network elements and services in Massachusetts.

Moreover, when Rhythms filed its comments in this proceeding, it did not have the benefit of the information regarding Carrier-to-Carrier metrics for DSL, which VZ-MA provided after comments were due. Therefore, in rendering its decision, the Department did not have the benefit of a fully developed record on DSL metrics. Thus, the Department should reconsider its *Order Adopting PAP* and as part of this reconsideration invite parties to comment on this new information.

Declining to add additional DSL measurements to the PAP,[4] the Department instead chose to allow the New York Commission to take the lead in determining what, if any, additional DSL metrics and performance measures should be adopted, and then merely mimicked the New York Commission's decision.[5] The Department should not wait for the New York Commission to amend the PAP with regard to DSL issues. In its Comments on the PAP, Rhythms indicated its concern that VZ-MA's performance on DSL issues would be inadequate after it gained § 271 approval unless (1) its performance on DSL was closely monitored; and (2) it faced sufficient

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[2] *Comments of Covad Communications Company and Rhythms Links Inc.*, D.T.E. 99-271 (filed Apr. 25, 2000) (*"Comments of Rhythms and Covad"*) at 1.
[3] Verizon has not yet provided any data for "PO-8-01: Manual Loop Qualification Response Time" or "PO-8-02: Engineering Record Request Response Time," two of the four DSL metrics approved by this Commission in its *March Order*. Neither has VZ-NY given any indication as to when such information may be expected.
[4] *Order Adopting PAP* at 26.

penalties for violations of its performance.[6] The record of VZ-MA's performance on DSL—which was made available after the deadline for comments in this proceeding—clearly shows that Verizon is not providing data CLECs with parity performance now, and has the potential to provide such poor performance in the future. Verizon's abysmal performance cannot be left unchecked after VZ-MA gains § 271 approval. Thus, the Department should reconsider its *Order Adopting PAP*, inspect the new information reported by VZ-MA since comments were filed, and implement the changes to the Plan as Rhythms proposes.

Specifically, the Department should amend the Massachusetts PAP to (1) create a new MOE measure for DSL service separate and apart from the UNE MOE, adding both DSL and line sharing metrics to that new MOE; and (2) add additional DSL measures and line sharing measures to the Critical Measures of the PAP. Additional DSL measures must be added to the PAP to ensure that Massachusetts consumers begin to receive the benefits of competition in the DSL services market. Given the importance of DSL and line sharing to the future deployment of telecommunications and advanced services to the consumers in Massachusetts, the Department should reconsider its Order adopting VZ-MA's proposed PAP consistent with Rhythms' proposals.

II. STANDARD OF REVIEW

Under the Department's Procedural Rule 220 C.M.R. § 1.11(10), a party is authorized to file a motion for reconsideration within twenty days of service of a final Department Order. The Department's policy on reconsideration is well settled. The Department may grant reconsideration of previously decided issues when "extraordinary circumstances dictate that the Department take a fresh look at the record for the express purpose of substantively modifying a

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[5] *Id.*

[6] *Comments of Rhythms and Covad* at 1-2; *Reply Comments of Rhythms and Covad* at 1.

decision reached after review and deliberation." *North Attleboro Gas Company*, D.P.U. 94-130-B at 2 (1995); *Boston Edison Company*, D.P.U. 90-270-A at 2-3 (1991); *Western Massachusetts Electric Company*, D.P.U. 558-A at 2 (1987).

A motion for reconsideration "should bring to light previously unknown or undisclosed facts that would have a significant impact upon the decision already rendered." *Western Massachusetts Electric Company*, D.P.U. 85-270-C at 12-13 (1987). It should not attempt to reargue issues considered and decided in the main case. *Commonwealth Electric Company*, D.P.U. 92-3C-1A at 3-6 (1995); *Boston Edison Company*, D.P.U. 90-270-A at 3 (1991); *Boston Edison Company*, D.P.U. 1350-A at 4 (1983). Alternatively, a motion for reconsideration may be based on the argument that the Department's treatment of an issue was the result of mistake or inadvertence. *Massachusetts Electric Company*, D.P.U. 90-261-B at 7 (1991); *New England Telephone and Telegraph Company*, D.P.U. 86-33-J at 2 (1989); *Boston Edison Company*, D.P.U. 1350-A at 5 (1983).

III. THE DEPARTMENT SHOULD RECONSIDER ITS DECISION WITH REGARD TO DSL AND LINE SHARING ISSUES

A. The Department Should Reconsider its Decision Because It Failed to Fully Consider DSL and Line Sharing Issues In Its Review of VZ-MA's Proposed PAP

1. The Department's Failure To Fully Consider DSL And Line Sharing Constitutes Grounds For Reconsideration of Its *Order Adopting PAP*.

The Department should reconsider its *Order Adopting PAP* due to the Department's failure to fully consider DSL and line sharing issues in its review of VZ-MA's proposed PAP. The Department dismissed, in one fell swoop, all parties comments without any substantive analysis, explaining that it "do[es] not find it necessary to discuss in detail the strengths and

weaknesses of other proposals. Nor [does the Department] find it necessary, given the non-adjudicatory nature of this proceeding, to discuss all of the arguments raised by participants."[7]

Instead the Department chose to only "focus on those issues most important to [its] overall analysis"[8] explaining that "[i]t is not necessary for [the Department] to analyze the PAP in detail relative to each FCC criterion, since that ground has already been covered by the [Federal Communication Commission ("FCC")] in finding favor with Verizon NY's PAP."[9] This, however, is an overstatement. As mentioned above, and explained in greater detail below, the New York PAP does not deal with all relevant DSL issues.

In its Order approving Verizon-New York's ("VZ-NY's") 271 application the FCC asked for distinct and separate analysis of DSL issues for any future 271 applications and expects to see a specific and comprehensive demonstration that the BOC has satisfied the Act's requirements for the provision of DSL loops.[10] The FCC explained that it would "find it most persuasive if future applicants under section 271, unlike [VZ-NY], make a separate and comprehensive evidentiary showing with respect to the provision of xDSL-capable loops."[11] The FCC further emphasized its intention to examine the issue of provision of DSL loops closely in future applications, as it did so in connection with its review of the SBC-Texas 271 bid.[12] Thus, while the FCC approved VZ-NY's 271 application without a separate and distinct showing for xDSL issues, VZ-MA will need to make this showing.

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[7] *Order Adopting PAP* at 23.
[8] *Order Adopting PAP* at 23.
[9] *Id.* at 23, n. 17.
[10] *Application By Bell Atlantic New York For Authorization Under Section 271 Of The Communications Act To Provide In-Region, InterLATA Service In The State Of New York*, Memorandum Opinion and Order, CC Docket No. 99-295, FCC 99-404, (rel. Dec. 22, 1999) ("*New York 271 Order*") at ¶ 330.
[11] *New York 271 Order* at ¶ 330.
[12] *Application By Southwestern Bell Long Distance Pursuant to Section 271 of the Telecommunications Act of 1996 To Provider In-Region, InterLATA Services In Texas*, Memorandum Opinion and Order, CC Docket No. 00-65, FCC 00-238, (rel. Jun. 30, 2000) ¶¶283-306.

Unlike VZ-NY, VZ-MA must demonstrate that it complies with the FCC's *Line Sharing Order*[13] in its bid for §271 approval. Thus, the PAP adopted in Massachusetts should reflect the developments in xDSL and line sharing that have taken place since the VZ-NY 271 application. What was "good enough" for VZ-NY a year ago is not sufficient today, given the progression the FCC has made with regard to advanced services and xDSL and line sharing. This proceeding is the forum in which the DSL and line sharing issues should be addressed for the Massachusetts PAP.

2. DSL and Line Sharing Performance Measures and Metrics are Integral to an Effective PAP

The FCC has made the importance of the provision of DSL-capable loops to 271 approval explicitly clear.[14] Given this critical link, the Department should guarantee that the ILEC, once having gained 271 approval, is held accountable for maintaining the standard of provisioning DSL loops. In order to safeguard against VZ-MA retreating from its obligations to continue non-discriminatory provisioning of xDSL-capable loops, the Department should make sure that VZ-MA's performance in this critical area is monitored and that it faces effective and relevant backsliding penalties should it fail to meet its continued obligation. Thus, it is important that the Department include relevant and specific DSL performance measures and metrics in its PAP.

For these same reasons, VZ-MA's provisioning of the high bandwidth portion of the loop, or the line sharing UNE, is also critical in evaluating VZ-MA's 271 application. Line sharing offers end user consumers in Massachusetts the promise of making advanced services more widely available, especially to residential consumers. Without metrics to evaluate VZ-

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[13] *Deployment of Wireline Services Offering Advanced Telecommunications Capability and Implementation of the Local Competition Provisions of the Telecommunications Act of 1996*, Third Report and Order CC Docket No. 98-

MA's ongoing performance with regard to line sharing, VZ-MA will have no incentive to maintain or improve its performance in an area that promises to be the future of the telecommunications market.

The PAP is meant to replace the incentives for pro-competitive behavior that disappear when VZ-MA is granted § 271 authority. If it is to serve that function in the market for DSL service, the PAP must be augmented as follows: (1) establish a separate MOE category covering DSL service (including line sharing) and include 11 general DSL metrics and seven line sharing metrics, as specified below in sections III.C.2-3, in this MOE category; and (2) add 3 general DSL and 3 line sharing metrics, as specified below in section III.C.4, to the Critical Measures.

The PAP as proposed by VZ-MA and adopted by the Department in its *Order Adopting PAP* is insufficient to ensure that VZ-MA's performance in providing wholesale services and network elements does not deteriorate after receiving FCC approval to offer in-region interLATA service. As mentioned above, the PAP proposed by VZ-MA is based on the PAP in effect in New York, which includes only four DSL measurements and bill credits that account for a mere one-tenth of one percent of the total dollars at risk in the PAP. While the New York Commission did attempt in an Order released in March 2000 to address CLEC concerns regarding the lack of performance metrics and remedies in the PAP for DSL issues,[15] this post-hoc attempt to rectify the PAP still fails to address all necessary and relevant DSL issues.[16] The existing New York PAP does far too little to promote non-discriminatory treatment that will make full competition in the provision of DSL services a reality. Under the New York PAP,

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147, Fourth Report and Order, CC Docket No. 96-98 (rel. Dec. 9, 1999) ("*Line Sharing Order*")

[14] *New York 271 Order* at ¶ 330.

[15] *Petition Filed By Bell Atlantic-New York For Approval of a Performance Assurance Plan and Change Control Assurance Plan, in 97-C-0271*, Case 99-C-0949, Order Amending Performance Assurance Plan (March 9, 2000) ("*New York Commission March Order*").

[16] *Comments of Rhythms and Covad* at 1.

Verizon's wholesale performance with regard to DSL services is measured by only four metrics, all contained within the Critical Measures subgroup. Of these four metrics, two are not supported by any Verizon data.[17] A new MOE category geared toward DSL issues, as well as additional Critical Measures covering DSL are needed to ensure the proper development of the market for DSL services in Massachusetts.

In addition, the PAP should explicitly and directly promote competition in line sharing. It is undisputed that line sharing will be the means, often the only means, of bringing affordable advanced services to the broadest group of residential and small business consumers in Massachusetts. Yet, the New York PAP, and thus the Massachusetts PAP, includes no metrics directed at line sharing.

It is worth noting that the New York Commission is currently engaged in its annual review of the New York PAP, "to determine whether any modifications or additions should be made"[18] and of significant concern is DSL and line sharing metrics. Many of the comments filed in that proceeding indicate that the experience gained by Verizon and CLECs—with VZ-MA's wholesale DSL provisioning in general and with line sharing in particular—justifies changes to the New York Plan.[19] In fact, VZ-NY has even indicated in its initial comments that the addition of new DSL line sharing measures for ordering, provisioning and maintenance as well as modification of the DSL loop measures should be considered by the New York Commission.[20]

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[17] Verizon has not yet provided any data for "PO-8-01: Manual Loop Qualification Response Time" or "PO-8-02: Engineering Record Request Response Time," two of the four DSL metrics approved by the New York Commission in its *New York March Order*. Neither has Verizon given any indication as to when such information may be expected.

[18] *Petition Filed By Bell Atlantic-New York For Approval of a Performance Assurance Plan and Change Control Assurance Plan, in 97-C-0271*, Case 99-C-0949, Notice Requesting Comments (August 28, 2000).

[19] New York PSC Case 99-C-949 – Annual Review of Performance Assurance Plan, *Comments of Rhythms Links Inc.* (filed Sep. 15, 2000) at 2-3; *Comments of WorldCom* (filed Sep. 15, 2000) at 8-12; *Comments of VZ-NY* (filed Sep. 15, 2000) at 1.

[20] Letter Comments of VZ-NY in Case 99-C-0949 regarding Annual Review of the New York Performance Assurance Plan (filed Sep. 15, 2000), at 1. ("*VZ-NY Annual PAP Review Comments*")

In declining to adopt any additional metrics, the Department has disregarded critical evidence as to the impact of an ineffective PAP on the continued deployment of advanced services throughout the Commonwealth.[21] The Department owes it to Massachusetts' end users and competitors to undertake a full evaluation of the PAP to assure the PAP will be "effective in practice."[22] As discussed in the comments Rhythms filed in this proceeding,[23] and even as acknowledged by Verizon in its comments for the Annual Review of the New York PAP,[24] the PAP—as it currently stands in New York and as was adopted by the Department in this proceeding for Massachusetts—will *not* be effective in practice to assure VZ-MA maintains an adequate level of performance in DSL loop provisioning and line sharing. The Department should not shrink from its responsibility to establish a thorough and complete PAP for Massachusetts. Though merely incorporating into the Massachusetts PAP "whatever new metrics, if any, the NYPSC adopts for the New York PAP" will "maintain consistency" between the Massachusetts and New York Plans,[25] that of itself does not make the PAP adequate.

The Department has the opportunity to establish performance measures and metrics and impose penalties to guarantee VZ-MA will continue to comply with its unbundling obligations and allow the continued development of competition throughout the Commonwealth, even after it receives § 271 authority. Merely because VZ-NY was the first Verizon affiliate to obtain § 271 relief does not mean the New York Commission is the only state commission qualified to evaluate competitive issues and establish effective backsliding precautions and performance evaluation procedures. As mentioned above, the *Line Sharing Order* was not released at the time

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[21] *Order Adopting PAP* at 26.
[22] *New York 271 Order* at 433.
[23] *Comments of Rhythms and Covad* at 1-2; *Reply Comments of Rhythms Links Inc. and Covad Communications Company* in D.T.E. Case 99-271 (filed May 19, 2000) ("*Reply Comments of Rhythms and Covad*") at 3-9.
[24] *VZ-NY Annual PAP Review Comments* at 1.
[25] *Order Adopting PAP* at 26.

VZ-NY filed its application for interLATA authority pursuant to § 271. The FCC thus, held that it would not be required to prove compliance with that decision in order to obtain § 271 approval, as the rules promulgated in the *Line Sharing Order* were not in effect at the time the FCC released its approval of VZ-NY's § 271 bid.[26] Such an exception does not exist for VZ-MA, however, and thus VZ-MA will have to prove compliance with the FCC's directives in the *Line Sharing Order* as a prerequisite to § 271 approval.

The Department has a unique obligation to the consumers and competitors in Massachusetts to assure that competitive access to DSL services is available in a non-discriminatory manner throughout the Commonwealth so that they may benefit from the newly emerging technology. The Department should ensure that the Massachusetts PAP is effective and includes sufficient metrics for advanced services.

B. The Department Should Reconsider its Decision Particularly in Light of the Fact that VZ-MA's Recently Submitted Performance Data on DSL Demonstrates that it is Providing CLECs with Below Parity Performance

As described above, the Department may grant reconsideration of a decision to allow a fresh look at the record when the motion "brings to light previously unknown or undisclosed facts that would have a significant impact upon the decision already rendered."[27] New information regarding VZ-MA's performance in DSL issues has been submitted by VZ-MA since the time that comments were filed in this proceeding. The Department should take a fresh look at the record compiled in the instant 271 proceeding that was not available at the time the comments on the PAP were filed. This newly proffered information sheds light on VZ-MA's performance on DSL issues thus far, and further demonstrates the need for including DSL- and line sharing-specific performance measures and metrics in the Massachusetts PAP. Without the

[26] *New York 271 Order* at ¶ 31.

inclusion of such measurements, VZ-MA will have no incentive to improve its performance on the provision and maintenance of xDSL and line shared loops.

The Department accepted Initial Comments in this proceeding on April 25, 2000 with Reply Comments filed on May 19. VZ-MA's obligation to provide performance data on DSL loops did not start until March 2000 and, since the performance reports are not sent to CLECs until after the 25th of the following month, CLECs did not have any meaningful opportunity to examine and comment on the the relationship between Verizon's reported performance data on DSL and the Performance Assurance Plan. Since the comment deadline in this proceeding, VZ-MA has filed several months of performance data that demonstrates that it is not providing CLECs with nondiscriminatory access to xDSL capable loops. Because this data was not available when CLECs filed comments on the PAP, the Department did not have the benefit of understanding from data LECs like Rhythms why it is essential that additional DSL measurements be added to the PAP. The existence of the DSL data proves the point that Rhythms attempted to make in its two sets of comments on the PAP—sufficient DSL penalties are necessary to deter poor performance.

VZ-MA's performance data for April through July demonstrates that VZ-MA is not providing CLECs with DSL capable loops in substantially the same interval in which it provides DSL service to its retail customers.[28] Specifically, in July, out of 10 provisioning metrics for 2-wire xDSL services, Verizon, by its own calculation, was out of parity on 8 metrics.[29] That same month, out of 11 maintenance metrics for the same services (2-wire xDSL), VZ-MA was out of

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[27] *Western Massachusetts Electric Company*, D.P.U. 85-270-C at 12-13 (1987)

[28] *See*, Carrier-to-Carrier Performance Standards and Reports, Interim Guidelines for April through July of CLEC Aggregate Performance for xDSL Provisioning and Maintenance - attached hereto as Exhibit 1.

[29] VZ-MA Performance Reports for July 2000 using the Carrier-to-Carrier Guidelines, D.T.E. 99-271 (filed Aug. 31, 2000) "Provisioning – UNE POTS/Special Services" Page 2 of 2.

parity on 8 of the metrics.[30] The June data is virtually the same—out of 9 2-wire xDSL provisioning metrics, VZ-MA was out of parity on 7 metrics.[31] For maintenance and repair that same month, out of 11 measurements, Verizon reported out of parity performance on 9 measurements.[32] The performance reports for May and April tell the same tale.[33]

It is crucial that the Department take a fresh look at this recently submitted information and take steps to ensure that VZ-MA is not permitted to fail in its provision of DSL loops without consequence. As the Department recognized, the function of a PAP is to "prevent ... 'backsliding'...by an [ILEC], once the ILEC gains entry into the long distance market."[34] Yet, the Massachusetts PAP as adopted here is insufficient to "bring[] to light and respond[] to [xDSL] performance issues" as they may arise after VZ-MA enters the long distance market.[35] Given the importance of DSL loops to the provision of advanced services in Massachusetts, it is incumbent upon the Department to use all information it has available to implement a PAP that will be an effective tool in encouraging VZ-MA to maintain acceptable performance in the realm of DSL loops and line sharing once it is granted § 271 authority.

C. On Reconsideration The Department Should Create a New Mode of Entry Category for DSL Service (Including Line Sharing) And Add Both DSL and Line Sharing Metrics to the MOE Category and to the Critical Measures of the PAP.

1. The Department Should Create a Separate Mode of Entry Category for DSL

To promote advanced services competition within Massachusetts, Rhythms urges the Department on reconsideration to add an MOE category that specifically addresses DSL service,

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[30] VZ-MA Performance Reports for July 2000 using the Carrier-to-Carrier Guidelines, D.T.E. 99-271 (filed Aug. 31, 2000) "Maintenance – UNE POTS/Special Services" Page 1 of 2.
[31] VZ-MA Supp. Measurements Affidavit, filed Aug. 4, 2000 in D.T.E. 99-271, Attachment G-2, Interim Guidelines for June 2000 at 10 of 14.
[32] *Id.* Interim Guidelines for June 2000 at 11 of 14.
[33] *Id.*, Interim Guidelines for April 2000 at 10 of 14 and 11 of 14; and, *Id.*, Interim Guidelines for May 2000 at 10 of 14 and 11 of 14.
[34] *Order Adopting PAP* at 1.

including line sharing. DSL is one of the fastest growing market segments, yet it is not captured in the Mode of Entry portion of the plan and is only marginally included in the critical measures. The absence of DSL metrics in the plan will permit Verizon's performance to go unchecked.

As highlighted in Rhythms' Reply Comments, the FCC has clearly indicated the need for separate treatment of DSL wholesaling activities.[36] It has generally recognized the importance of broadband capabilities and DSL services.[37] The FCC has recognized that "the demand for broadband capability is growing rapidly" and "[f]or consumers, access to broadband capability means that many new services and vast improvements to existing services will be available."[38] In fact, the FCC has remarked that the ability of all Americans to access high-speed networks through DSL-based services and to "share in their resources, will very likely spur our growth and development as a nation."[39] In the *New York 271 Order*, the FCC emphasized that in future applications there must be a demonstration of DSL performance independent of the applicant's general performance in providing unbundled network elements.[40]

This Department also specifically recognized the importance of requiring VZ-MA to offer xDSL capable loops and directed VZ-MA to develop comprehensive tariff provisions covering rates terms and conditions for xDSL-capable loops which was addressed during the

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[35] *Id.* at 23, n. 16.

[36] *Rhythms and Covad Reply Comments* at 5-6.

[37] *E.g., Deployment of Wireline Services Offering Advanced Telecommunications Capability*, CC Docket No. 98-147, Memorandum Opinion and Order and Notice of Proposed Rulemaking, FCC 98-188, ("*Advanced Serviced Order and NPRM*") ¶¶ 7-8; Inquiry *Concerning the Deployment of Advanced Telecommunications Capability to All Americans in a Reasonable and Timely Fashion, and Possible Steps to Accelerate Such Deployment Pursuant to Section 706 of the Telecommunications Act of 1996*, CC Docket 98-146, Report, FCC 99-5 (rel. Feb. 2, 1999), ("*Section 706 Report to Congress*") ¶¶ 3-6, 14-18; *Line Sharing Order* ¶¶ 25,29,35-37.

[38] *Section 706 Report to Congress* at ¶ 3.

[39] *Advanced Serviced Order and NPRM* at ¶ 7.

[40] *Application By Bell Atlantic New York For Authorization Under Section 271 Of The Communications Act To Provide In-Region, InterLATA Service In The State Of New York*, Memorandum Opinion and Order, CC Docket No. 99-295, FCC 99-404, at ¶ 330 (rel. Dec. 22, 1999) ("[w]e will find it most persuasive if future applicants under section 271, unlike this applicant, *make a separate and comprehensive evidentiary showing with respect to the provision of xDSL-capable loops*, either through proof of a fully operational separate advanced services affiliate as

Department's ongoing Docket 98-57, Phase III.[41] It is clear, then, that xDSL is integral to current and future competition in the telecommunications market and is an area with great growth and burgeoning competition. Likewise, post-Section 271 approval, there must be an emphasis on VZ-MA's wholesale performance in the DSL arena to ensure continued growth and development of that market.

As discussed in Rhythms' Reply Comments, a number of additional considerations support the creation of a DSL/line sharing MOE separate and apart from the UNE MOE to address this need. The provisioning processes for DSL loops is distinct from that for voice-grade loops, so that VZ-MA's performance in provisioning voice loops is largely irrelevant to its DSL performance.[42] For instance, VZ-MA performs a hot-cut in the central office for the majority of voice-grade loops, while it treats stand-alone DSL loops as "new" loops that generally require a dispatch. In addition, there are important provisioning services that VZ-MA performs exclusively for purchasers of DSL loops, such as loop qualification, loop conditioning, and cooperative testing. In its *March Order* the New York Commission recognized that the process for provisioning DSL loops requires a "substantial amount of coordination."[43]

DSL is not just another type of loop by which CLECs can offer retail services. Rather, it is a separate and distinct service.[44] Indeed, many CLECs—including Rhythms—focus almost

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described below, which may also include appropriate performance measures, or through a showing of nondiscrimination in accordance with the guidance provided herein.") (emphasis added).

[41] *Investigation by the Department on its own motion as to the propriety of the rates and charges set forth in the following tariffs: M.D.T.E. Nos. 14 and 17, filed with the Department on August 27, 1999, to become effective on September 27, 1999, by New England Telephone and Telegraph Company d/b/a Bell Atlantic-Massachusetts*, D.T.E 98-57 (rel. Mar. 24, 2000) ("*Tariff 17 Decision*") at 166-167. The Department also recognized the importance of xDSL separate and apart from interconnection, collocation, or UNEs and *specifically* directed BA-MA to address xDSL in its evaluation of its progress toward 271 approval in light of the FCC's *Bell Atlantic New York Order*. Revised Schedule in D.T.E. 99-271 Memorandum from Cathy Carpino and Tina Chin, Hearing Officers, (Apr. 24, 2000).

[42] *See, Rhythms and Covad Reply Comments* at 6.

[43] *New York Commission March Order* at 4.

[44] *See, Rhythms and Covad Reply Comments* at 4-5.

exclusively on providing DSL-based services. As such, they order, almost exclusively, DSL and premium loops from VZ-MA. Indeed, VZ-MA separately tracks and reports on its own performance with regard to 2-wire xDSL loops each month.[45] Because DSL is a distinct service, which VZ-MA already tracks its performance for DSL separately, DSL should be its own MOE.

The differences between voice and DSL loops, as well as the experience gained in provisioning such loops over the last several years, justifies creating a separate DSL MOE. Otherwise, if VZ-MA successfully meets all voice-grade UNE performance measures, yet underperforms in providing DSL loops or line sharing, its discrimination against data LECs may be concealed in its overall performance.[46] To detect and deter discriminatory provisioning of DSL network elements and services, the Department should create a separate MOE for DSL.

The time is ripe for a separate and distinct DSL MOE. CLECs and Verizon have now been provisioning stand-alone DSL loops for a number of years, and the New York DSL Collaborative now has a full year of history behind it. Indeed, as explained below, VZ-MA and CLECs have since moved on to the next step in advanced services provisioning: line sharing.[47] Clearly, the technology and regulatory landscape has evolved to the point that a separate MOE for DSL is not only justified, but necessary.[48]

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[45] *See, e.g.*, Carrier-to-Carrier Performance Standards and Reports, Interim Guidelines for April through July, attached hereto as Exhibit 1.

[46] *See*, discussion at *Rhythms and Covad Reply Comments* at 6-7.

[47] In fact the parties have recently agreed to a series of line sharing metrics that are at the point of being approved by the New York Commission in the Carrier-to-Carrier proceeding and thus will be applicable in Massachusetts. *See*, § III.B.3 *infra*.

[48] In the alternative, should the Department refuse to create a separate MOE category for DSL, the current UNE category should be expanded to include the DSL and line sharing measures identified below. As proposed by VZ-MA and contained in the New York PAP, the UNE MOE does not include any DSL measures. Adding DSL and line sharing to the UNE MOE would at least create some incentive (albeit, in Rhythms' view, an inadequate one) for VZ-MA to treat unaffiliated DSL providers in a non-discriminatory manner.

2. The Department Should Add A Range Of DSL Metrics To The Newly-Created MOE

As noted above, the MOE categories in the Massachusetts PAP as adopted do not include any metrics covering DSL or line sharing. Rhythms requests that on reconsideration the Department include the following metrics in the separate DSL MOE. A short explanation of each group of metrics and Rhythms' reasoning for inclusion follows each. First, the following metrics will ensure VZ-MA's proper and timely provisioning of the elements necessary for the competitive offering of xDSL services:

PR-3-10: Percentage Completed within 6 Days (1-5 Lines – Total)
PR-4-02: Average Delay Days – Total
PR-4-04: Percentage Missed Appointment – Verizon – Dispatch
PR-5-01: Percentage Missed Appointment – Verizon Facilities.

Second, the addition of the following metrics will provide valuable information on VZ-MA's maintenance and repair of xDSL elements:

MR-2-02: Network Trouble Report Rate - Loop
MR-2-03: Network Trouble Report Rate – Central Office
MR-3-01: Missed Repair Appointment - Loop
MR-4-02: Mean Time to Repair – Loop Trouble
MR-4-03: Mean Time to Repair – Central Office Trouble
MR-5-01: Percentage Repeat Reports within 30 Days

It is worth noting that not a single PAP metric (in either the MOE category or the Critical Measures category) has been designed to measure maintenance and repair of elements leased by Rhythms from VZ-MA, even though such maintenance and repair is crucial to maintaining efficient service to Rhythms' customers. These DSL metrics will aid in providing broad coverage of the most common troubles that DSL competitors have encountered in dealing with VZ-MA. The adoption of such measures will ensure that Verizon meets its post-Section 271 obligations and continues to permit the development of competition in advanced services in Massachusetts.

3. The Department Must Add Line Sharing Metrics to the Newly-Created MOE

Line sharing in Massachusetts will be rapidly developing. VZ-MA has successfully been provisioning line sharing for more than a year without competition. Successful implementation of the requirements of the FCC's *Line Sharing Order* has put the Department in a position to establish a set of ground rules that will permit a far more competitive environment for line sharing. This is a momentous step in the development of advanced services. For the first time, DSL services are available competitively to homes and small-to medium-sized businesses in Massachusetts. There can be no doubt that the provisioning of line sharing will become a significant portion of VZ-MA's wholesale service responsibilities.

The issue of DSL line sharing metrics has been addressed in the New York Carrier-to-Carrier proceeding,[49] in which line sharing metrics have been developed and are set to be approved by the New York Commission. The Department adopted the Carrier-to-Carrier Performance Guidelines (as amended on a going-forward basis) as the "set of metrics used by the Department for purposes of the Master Test Plan and for evaluating Bell Atlantic's compliance with the Requirements of Section 271."[50] In addition, the Department recently has had the opportunity to examine line sharing in more detail in Phase III of D.T.E. 98-57.[51] The time is ripe for the adoption of metrics to govern the provisioning of line sharing, in order to ensure that this emerging market segment, in which VZ-MA—and its soon-to-be-operational data affiliate—has had a tremendous head start, is allowed a full opportunity to develop competitively. Indeed, given VZ-MA's poor performance in provisioning stand-alone DSL

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[49] New York PSC Case No. 97-C-0139.

[50] *See*, January 14, 2000 DTE Letter Order on Final OSS Master Test Plan, Attach, A.

[51] *Investigation by the Department on its own motion as to the propriety of the rates and charges set forth in M.D.T.E. No. 17, filed with the Department on May 5, 2000 to become effective June 4, 2000 by New England Telephone and Telegraph Company d/b/a Bell Atlantic-Massachusetts*, Evidentiary Hearings held August 1 – 3, 2000.

loops, the Department should be especially vigilant in ensuring that no further competitive advantage is given to VZ-MA, or any affiliate, at the expense of competitors.

Accordingly, Rhythms requests that in amending its *Order Adopting PAP*, the Department include the following line sharing metrics in the separate DSL MOE:

PR-1-01: Average Interval Offered – No Dispatch
PR-2-01: Average Interval Completed – No Dispatch
PR 4-02: Average Delay Days – Total
PR-4-04: Percentage Missed Appointment – Dispatch
PR-4-05: Percentage Missed Appointment – No Dispatch
PR-6-01: Percentage Installation Troubles within 30 Days
MR-4-01: Mean Time to Repair – Total

While certainly not a comprehensive list of competitive concerns, these line sharing metrics provide broad coverage of line sharing areas of great competitive significance to Rhythms and other competitors, and areas where Rhythms has had the greatest difficulties with Verizon. The addition of these measures will ensure that line sharing, a tremendous leap forward in the goal of ubiquitous availability of advanced services, is properly represented as a critical component of Verizon's obligation to provide non-discriminatory wholesale services.

4. The Department Should Supplement the DSL Metrics Contained in the PAP's Critical Measures

As the Department recognized in its *Order Adopting PAP*, the "MOE measurements provide a mechanism to measure the overall level of Verizon service to the entire CLEC industry...[and t]he Critical Measures segment... measures performance (on both a CLEC-specific and a CLEC-aggregate basis) for those 12 areas that are considered the most important in providing quality wholesale service."[52] Accordingly, poor performance in any one Critical Measure category or subcategory will trigger a market adjustment.

[52] *Order Adopting PAP* at 5. (citations omitted)

Only four DSL-related metrics are currently included in the New York PAP Critical Measures, and thus also included in the Massachusetts Plan. These are: "PO-8-01: Manual Loop Qualification Response Time," "PO-8-02: Engineering Record Request Response Time," "PR-4-14 through PR-4-18: Missed Appointment metrics for DSL Services," and "PR-6-01: Installation Troubles for DSL capable loops reported within 30 days." For the first two of these metrics, Manual Loop Qualification Response Time and Engineering Record Request Response Time, Verizon has neither provided data by which to judge its performance nor stated when it expects to have such data. Thus, for all practical purposes, those two metrics are now and will indefinitely remain useless for gauging the wholesale DSL services being provided by VZ-MA.

Critical Measures applicable to the DSL market are crucial. First, the market for DLS services, especially line sharing, is in its infancy and requires vigilant protection from discrimination by those in control of bottleneck facilities. Second, the development of a competitive advanced services market in Massachusetts requires automatic and immediate market adjustments to ensure the proper development of competition. Finally, as proven by the performance data related above, the recent addition of only four DSL metrics to the Critical Measures by the New York Commission to the New York PAP is insufficient to ensure that VZ-MA will properly execute its responsibilities with regard to the provisioning of DSL lines and line sharing.

For these reasons, Rhythms requests that the Department add the following 2-wire xDSL metrics to the Critical Measures in the Massachusetts PAP:

PR-2-02: Average Interval Completed – Total Dispatch
PR-4-02: Average Delay Days - Total
MR-4-01: Mean Time to Repair – Total

Because of its singular importance to Massachusetts residential consumers, on reconsideration the Department should also include line sharing metrics in the Critical Measures. Indeed, Bell Atlantic has been providing its own retail DSL services solely via line sharing arrangements for more than a year, while failing to make this functionality possible for competitors.[53] Accordingly, the Department should add the following line sharing metrics to the Critical Measures of the PAP:

PR-2-01: Average Interval Completed – No Dispatch
PR-4-02: Average Delay Days - Total
MR-4-01: Mean Time to Repair – Total

IV. CONCLUSION

For the foregoing reasons, Rhythms' Motion for Reconsideration of the *Order Adopting PAP* should be granted.

Respectfully submitted,

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September 25, 2000

[53] Bell Atlantic Telephone Co., Tariff F.C.C. No. 1, Transmittal No. 1076 (Sept. 1, 1998).

EXHIBIT 1

Carrier-to-Carrier Performance Standards and Reports
Interim Guidelines April 2000 through July 2000 Representing
CLEC Aggregate Performance for xDSL Provisioning and Maintenance
Verizon-Massachusetts

Carrier to Carrier

Performance Standards and Reports
Interim Guidelines April 2000
Bell Atlantic - Massachusetts

CLEC Aggregate Performance

PROVISIONING - UNE POTS / SPECIAL SERVICES continued

Metric #	2-Wire xDSL Services	Standard	Actual Performance: BA	Actual Performance: CLEC Aggregate	Number of Observations: BA	Number of Observations: All CLECs	Standard Deviation	Sampling Error	Z-Score
	PR-1 - Average Interval Offered								
PR-1-01	Av. Interval Offered – Total No Dispatch	Parity with BA Retail	9.17	6.92	2206	794	6.49	0.27	6.38
PR-1-02	Av. Interval Offered – Total Dispatch	Parity with BA Retail	12.19	7.56	606	1091	4.91	0.25	18.63
	PR-2 - Average Completed Interval								
PR-2-01	Av. Interval Completed – Total No Dispatch	Parity with BA Retail	6.76	5.98	1697	279	5.53	0.35	7.84
PR-2-02	Av. Interval Completed – Total Dispatch	Parity with BA Retail	12.14	7.80	526	992	4.67	0.25	17.23
	PR-4 - Missed Appointments								
PR-4-02	Average Delay Days – Total	Parity with BA Retail	2.21	3.10	28	81	2.36	0.54	-1.64
PR-4-03	% Missed Appointment – Customer	None: Analysis Only	2.97	7.35					
PR-4-04	% Missed Appointment – BA – Dispatch	Parity with BA Retail	2.57	3.68	622	1659		0.74	-1.49
PR-4-05	% Missed Appointment – BA – No Dispatch	Parity with BA Retail	0.55	NA	2175				
PR-4-06	% Missed Appt. – Customer – Late Order Conf.	None: Analysis Only		0.00		1659			
PR-4-14	% Completed On Time - Complex (DO-2 Test & Serial Number)	95% on Time		UD					
PR-4-15	% Completed On Time - Complex (DO-2 Test Total)	95% on Time		UD					
PR-4-16	% Completed On Time - Complex (No DO-2 Test & Serial Number)	95% on Time		UD					
PR-4-17	% Completed On Time - Complex (No DO-2 Test & 800# Provided)	95% on Time		UD					
PR-4-16	% Completed On Time - Cmplx (No DO-2 Test & No 800# Provided)	95% on Time		UD					
	PR-5 - Facility Missed Orders								
PR-5-01	% Missed Appointment - Bell Atlantic - Facilities	Parity with BA Retail	0.07	3.19	2797	1659		0.06	-38.07
PR-5-02	% Orders Held for Facilities > 15 Days	Parity with BA Retail	0.00	0.00	2797	1659			
PR-5-03	% Orders Held for Facilities > 60 Days	Parity with BA Retail	0.00	0.00	2797	1659			
	PR-6 - Installation Quality								
PR-6-01	% Install. Troubles Reported within 30 Days	Parity with BA Retail	3.60	6.56	209420	1475		0.49	-6.13
PR-6-03	% Install. Troubles Reported within 30 Days - FOK/TOK/CPE	Parity with BA Retail	2.61	8.66	209420	1475		0.42	-14.57
	Special Services - Provisioning								
	PR-1 - Average Interval Offered								
PR-1-01	Av. Interval Offered – Total No Dispatch	Parity with BA Retail	7.19	16.95	4301	21	6.15	1.35	-7.25
PR-1-02	Av. Interval Offered – Total Dispatch	Parity with BA Retail	11.27	9.78	1485	18	5.24	1.24	1.26
PR-1-06	Av. Interval Offered – DS0	Parity with BA Retail	10.69	NA	520		4.40		
PR-1-07	Av. Interval Offered – DS1	Parity with BA Retail	10.18	10.50	3243	32	6.46	1.15	-0.28
PR-1-08	Av. Interval Offered – DS3	Parity with BA Retail	11.50	28.00	2	7	3.54	2.84	-5.81
PR-1-09	Av. Interval Offered – Total - EEL – Backbone	EEL Legend		UD					
PR-1-09	Av. Interval Offered – Total - EEL – Loop	EEL Legend		UD					
PR-1-09	Av. Interval Offered – Total - IOF	IOF Legend		14.82		121			
PR-1-10	Av. Interval Offered – Disconnects – No Dispatch	Parity with BA Retail	4.65	NA	869		4.01		
PR-1-11	Av. Interval Offered – Disconnects – Dispatch	Parity with BA Retail	9.57	NA	7		6.95		
	PR-2 - Average Completed Interval								
PR-2-01	Av. Interval Completed – Total No Dispatch	Parity with BA Retail	6.69	19.27	3543	11	5.39	1.63	-7.73
PR-2-02	Av. Interval Completed – Total Dispatch	Parity with BA Retail	11.15	8.50	1073	14	5.63	1.57	1.05
PR-2-06	Av. Interval Completed – DS0	Parity with BA Retail	10.46	NA	265		6.22		
PR-2-07	Av. Interval Completed – DS1	Parity with BA Retail	8.63	9.75	2677	20	5.66	1.26	-0.69
PR-2-08	Av. Interval Completed – DS3	Parity with BA Retail	NA	30.00		5			
PR-2-09	Av. Interval Completed – Total - EEL - Backbone	EEL Legend		UD					
PR-2-09	Av. Interval Completed – Total - EEL – Loop	EEL Legend		UD					
PR-2-09	Av. Interval Completed – Total - IOF	IOF Legend		22.95		37			
PR-2-10	Av. Interval Completed - Disconnects - No Dispatch	Parity with BA Retail	4.61	NA	795		3.77		
PR-2-11	Av. Interval Completed – Disconnects – Dispatch	Parity with BA Retail	9.57	NA	7		6.95		
	PR-4 - Missed Appointments								
PR-4-01	% Missed Appointment – BA – Total	Parity with BA Retail	1.12	4.17	5629	46		1.53	-2.00
PR-4-01	% Missed Appointment – BA – Total - EEL	Parity with BA Retail	1.12	UD	5629				
PR-4-01	% Missed Appointment – BA – Total- IOF	Parity with BA Retail	1.12	3.08	5629	130		0.83	-2.10
PR-4-02	Average Delay Days – Total	Parity with BA Retail	4.65	4.50	63	2	7.00	5.03	0.03
PR-4-02	Average Delay Days – Total - EEL	Parity with BA Retail	4.65	UD	63		7.00		
PR-4-02	Average Delay Days – Total - IOF	Parity with BA Retail	4.65	40.75	63	4	7.00	3.61	-10.00
PR-4-03	% Missed Appointment – Customer	None: Analysis Only	8.35	12.50					
PR-4-03	% Missed Appointment – Customer - EEL	None: Analysis Only	8.35	UD					
PR-4-06	% Missed Appt. – Customer – Late Order Conf.	None: Analysis Only	0.00			46			
	PR-5 - Facility Missed Orders								
PR-5-01	% Missed Appointment – BA – Facilities	Parity with BA Retail	0.28	0.00	5629	46		0.77	0.37
PR-5-02	% Orders Held for Facilities > 15 Days	Parity with BA Retail	0.05	0.00	5629	46		0.32	0.15
PR-5-03	% Orders Held for Facilities > 60 Days	Parity with BA Retail	0.00	0.00	5629	46			
	PR-6 - Installation Quality								
PR-6-01	% Installation Troubles reported within 30 Days	Parity with BA for Parity Products	0.56	0.00	11367	46		1.06	0.52
PR-6-03	% Inst. Troubles reported w/ in 30 Days - FOK/TOK/CPE	None: Analysis Only	0.03	0.00	11367	46		0.23	0.11
	PR-7 - Jeopardy Reports								
PR-7-01	% Orders with Jeopardy Status - EEL	Jeopardy Legend		UD					

*Legend Notations defined on Legend sheet - last page

Carrier to Carrier
Performance Standards and Reports
Interim Guidelines April 2000
Bell Atlantic - Massachusetts

CLEC Aggregate Performance
MAINTENANCE - UNE POTS / SPECIAL SERVICES

Metric #		Standard	Actual Performance: BA	Actual Performance: CLEC Aggregate	Number of Observations: BA	Number of Observations: All CLECs	Standard Deviation	Sampling Error	Z-Score
	Maintenance - POTS Loop								
	MR-2 - Trouble Report Rate								
MR-2-02	Network Trouble Report Rate – Loop	Parity with BA Retail	1.13	1.11	4262750	19301		0.06	0.21
MR-2-03	Network Trouble Report Rate – Central Office	Parity with BA Retail	0.09	0.13	4262750	19301		0.02	-1.68
MR-2-04	% Subsequent Reports	ICAW MRAs	19.96	12.41					
MR-2-05	% CPE/TOK/FOK Trouble Report Rate	None: Analysis Only	0.81	2.64	4262750	19301		0.06	-28.26
	MR-3 - Missed Repair Appointments								
MR-3-01	% Missed Repair Appointment – Loop	Parity with BA Retail	8.91	19.07	48174	215		1.95	-5.22
MR-3-02	% Missed Repair Appointment – Central Office	Parity with BA Retail	7.30	0.00	3947	25		5.22	1.40
MR-3-03	% CPE/TOK/FOK - Missed Appointment		5.36	18.66	34518	509		1.01	-13.23
MR-3-04	% Missed Repair Appoint - No Double Dispatch		4.81	13.02	2318	28		4.07	-2.02
MR-3-05	% Missed Repair appointment - Double Dispatch		3.49	3.72	1679	8		6.50	-0.04
	MR-4 - Trouble Duration Intervals								
MR-4-01	Mean Time To Repair – Total	Parity with BA Retail	19.15	25.32	52121	240	16.47	1.19	-5.16
MR-4-02	Mean Time To Repair – Loop Trouble	Parity with BA Retail	20.00	27.62	48174	215	16.57	1.27	-6.00
MR-4-03	Mean Time To Repair – Central Office Trouble	Parity with BA Retail	8.90	5.55	3947	25	13.62	2.73	1.23
MR-4-04	% Cleared (all troubles) within 24 Hours	Parity with BA Retail	72.40	66.67	52121	240		2.89	-1.98
MR-4-07	% Out of Service > 12 Hours	Parity with BA Retail	59.91	70.89	40286	158		3.91	-2.81
MR-4-08	% Out of Service > 24 Hours	Parity with BA Retail	26.95	34.18	40286	158		3.54	-2.04
MR-4-09	Mean Time To Repair - No Double Dispatch	Parity with BA Retail	UD	UD					
MR-4-10	Mean Time To Repair - Double Dispatch	Parity with BA Retail	UD	UD					
	MR-5 - Repeat Trouble Reports								
MR-5-01	% Repeat Reports within 30 Days	Parity with BA Retail	18.41	14.17	52121	240		2.51	1.69
	Maintenance - POTS Platform								
	MR-2 - Trouble Report Rate								
MR-2-02	Network Trouble Report Rate – Platform	Parity with BA Retail	1.13	0.17	4262750	12541		0.09	10.18
MR-2-03	Network Trouble Report Rate – Central Office	Parity with BA Retail	0.09	0.04	4262750	12541		0.03	1.94
MR-2-04	% Subsequent Reports	ICAW MRAs	19.96	10.34					
MR-2-05	% CPE/TOK/FOK Trouble Report Rate	None: Analysis Only	0.81	0.12	4262750	12541		0.06	8.61
	MR-3 - Missed Repair Appointments								
MR-3-01	% Missed Repair Appointment – Platform	Parity with BA Retail	8.91	19.05	48174	21		6.22	-1.63
MR-3-02	% Missed Repair Appointment – Central Office	Parity with BA Retail	7.30	0.00	3947	5		11.64	0.63
MR-3-03	% CPE/TOK/FOK - Missed Appointment - Platform		5.36	6.67	34518	15		5.82	-0.23
MR-3-04	% Missed Repair Appointment - No Double Dispatch		4.81	14.29	2318	3		12.36	-0.77
MR-3-05	% Missed Repair Appointment - Double Dispatch		3.49	4.76	1679	1		18.36	-0.07
	MR-4 - Trouble Duration Intervals								
MR-4-01	Mean Time To Repair – Total	Parity with BA Retail	19.15	11.88	52121	26	16.47	3.62	2.01
MR-4-02	Mean Time To Repair – Loop Trouble - Platform	Parity with BA Retail	20.00	14.32	48174	21	16.57	4.05	1.40
MR-4-03	Mean Time To Repair – Central Office Trouble	Parity with BA Retail	8.90	1.67	3947	5	13.62	6.09	1.19
MR-4-04	% Cleared (all troubles) within 24 Hours	Parity with BA Retail	72.40	88.46	52121	26		8.77	1.83
MR-4-06	% Out of Service > 4 Hours	Parity with BA Retail	82.94	76.47	40286	17		9.13	0.71
MR-4-07	% Out of Service > 12 Hours	Parity with BA Retail	59.91	58.82	40286	17		11.89	0.09
MR-4-08	% Out of Service > 24 Hours	Parity with BA Retail	26.95	17.65	40286	17		10.76	0.86
	MR-5 - Repeat Trouble Reports								
MR-5-01	% Repeat Reports within 30 Days	Parity with BA Retail	18.41	11.54	52121	26		7.60	0.90
	2-Wire Digital Services - Maintenance								
	MR-2 - Trouble Report Rate								
MR-2-02	Network Trouble Report Rate - Loop	Parity with BA Retail	1.13	0.67	4262750	10240		0.10	4.36
MR-2-03	Network Trouble Report Rate - Central Office	Parity with BA Retail	0.09	0.13	4262750	10240		0.03	-1.14
MR-2-05	% CPE/TOK/FOK Trouble Report Rate	None: Analysis Only	0.81	1.24	4262750	10240		0.09	-4.85
	MR-3 - Missed Repair Appointments								
MR-3-01	% Missed Repair Appointment – Loop	Parity with BA Retail	8.91	10.14	48174	69		3.43	-0.36
	MR-4 - Trouble Duration Intervals								
MR-4-01	Mean Time To Repair - Total	Parity with BA Retail	19.15	36.50	52121	82	16.47	2.04	-8.48
MR-4-02	Mean Time To Repair - Loop Trouble	Parity with BA Retail	20.00	39.98	48174	69	16.57	2.24	-8.93
MR-4-03	Mean Time To Repair - Central Office Trouble	Parity with BA Retail	8.90	30.55	3947	13	13.62	3.78	-5.72
MR-4-08	% Out of Service > 24 Hours	Parity with BA Retail	26.95	46.51	40286	43		6.77	-2.89
MR-4-09	Mean Time To Repair - No Double Dispatch	Parity with BA Retail	UD	UD					
MR-4-10	Mean Time To Repair - Double Dispatch	Parity with BA Retail	UD	UD					
	MR-5 - Repeat Trouble Reports								
MR-5-01	% Repeat Reports within 30 Days	Parity with BA Retail	18.41	15.85	52121	82		4.28	0.60
	2-Wire xDSL Services - Maintenance								
	MR-2 - Trouble Report Rate								
MR-2-02	Network Trouble Report Rate - Loop	Parity with BA Retail	1.13	1.89	4262750	10240		0.10	-7.31
MR-2-03	Network Trouble Report Rate - Central Office	Parity with BA Retail	0.09	0.35	4262750	10240		0.03	-8.61
MR-2-05	% CPE/TOK/FOK Trouble Report Rate	None: Analysis Only	0.81	2.79	4262750	10240		0.09	-22.37
	MR-3 - Missed Repair Appointments								
MR-3-01	% Missed Repair Appointment – Loop	Parity with BA Retail	8.91	13.40	48174	194		2.05	-2.19
	MR-4 - Trouble Duration Intervals								
MR-4-01	Mean Time To Repair - Total	Parity with BA Retail	19.15	44.52	52121	230	16.47	1.22	-20.79
MR-4-02	Mean Time To Repair - Loop Trouble	Parity with BA Retail	20.00	50.58	48174	194	16.57	1.34	-22.90
MR-4-03	Mean Time To Repair - Central Office Trouble	Parity with BA Retail	8.90	11.87	3947	36	13.62	2.28	-1.30
MR-4-08	% Out of Service > 24 Hours	Parity with BA Retail	26.95	49.23	40286	130		3.90	-5.72
MR-4-09	Mean Time To Repair - No Double Dispatch	Parity with BA Retail	UD	UD					
MR-4-10	Mean Time To Repair - Double Dispatch	Parity with BA Retail	UD	UD					
	MR-5 - Repeat Trouble Reports								
MR-5-01	% Repeat Reports within 30 Days	Parity with BA Retail	18.41	13.91	52121	230		2.56	1.76

continued

Carrier to Carrier
Performance Standards and Reports
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CLEC Aggregate Performance
PROVISIONING - UNE POTS / SPECIAL SERVICES continued

Metric #	2-Wire xDSL Services	Standard	Actual Performance: BA	Actual Performance: CLEC Aggregate	Number of Observations: BA	Number of Observations: All CLECs	Standard Deviation	Sampling Error	Z-Score
	PR-1 - Average Interval Offered								
PR-1-01	Av. Interval Offered – Total No Dispatch	Parity with BA Retail	6.96	6.54	2662	1076	4.96	0.18	2.35
PR-1-02	Av. Interval Offered – Total Dispatch	Parity with BA Retail	8.90	7.19	666	999	4.04	0.20	8.54
	PR-2 - Average Completed Interval								
PR-2-01	Av. Interval Completed – Total No Dispatch	Parity with BA Retail	6.77	5.68	2375	418	4.13	0.22	4.96
PR-2-02	Av. Interval Completed – Total Dispatch	Parity with BA Retail	8.96	7.49	605	836	4.33	0.23	6.36
	PR-4 - Missed Appointments								
PR-4-02	Average Delay Days – Total	Parity with BA Retail	2.95	2.68	20	57	4.65	1.21	0.22
PR-4-03	% Missed Appointment – Customer	None: Analysis Only	2.76	12.53					
PR-4-04	% Missed Appointment – BA – Dispatch	Parity with BA Retail	1.94	3.28	720	1740		0.61	-2.19
PR-4-05	% Missed Appointment – BA – No Dispatch	Parity with BA Retail	0.23	NA	2578				
PR-4-06	% Missed Appt. – Customer – Late Order Conf.	None: Analysis Only	0.17	0.17		1740			
PR-4-14	% Completed On Time - Complex (DO-2 Test & Serial Number)	95% on Time		NA					
PR-4-15	% Completed On Time - Complex (DO-2 Test Total)	95% on Time		NA					
PR-4-16	% Completed On Time - Complex (No DO-2 Test & Serial Number)	95% on Time		NA					
PR-4-17	% Completed On Time - Complex (No DO-2 Test & BOOF Provided)	95% on Time		NA					
PR-4-18	% Completed On Time - Cmplx (No DO-2 Test & No BOOF Provided)	95% on Time		NA					
	PR-5 - Facility Missed Orders								
PR-5-01	% Missed Appointment - Bell Atlantic - Facilities	Parity with BA Retail	0.12	2.62	3298	1740		0.10	-26.32
PR-5-02	% Orders Held for Facilities > 15 Days	Parity with BA Retail	0.03	0.00	3298	1740		0.05	0.56
PR-5-03	% Orders Held for Facilities > 60 Days	Parity with BA Retail	0.00	0.00	3298	1740			
	PR-6 - Installation Quality								
PR-6-01	% Install. Troubles Reported within 30 Days	Parity with BA Retail	3.30	7.94	3148	1537		0.56	-8.33
PR-6-03	% Install. Troubles Reported within 30 Days - FOK/TOK/CPE	Parity with BA Retail	2.73	10.60	3148	1537		0.51	-15.91
	Special Services - Provisioning								
	PR-1 - Average Interval Offered								
PR-1-01	Av. Interval Offered – Total No Dispatch	Parity with BA Retail	6.39	14.14	4725	22	5.35	1.14	-6.76
PR-1-02	Av. Interval Offered – Total Dispatch	Parity with BA Retail	9.84	10.67	1534	21	5.35	1.16	-0.71
PR-1-06	Av. Interval Offered – DS0	Parity with BA Retail	12.21	NA	506		6.26		
PR-1-07	Av. Interval Offered – DS1	Parity with BA Retail	7.91	9.71	3751	35	5.45	0.93	-1.94
PR-1-08	Av. Interval Offered – DS3	Parity with BA Retail	14.00	24.36	2	8	12.73	10.06	-1.03
PR-1-09	Av. Interval Offered – Total - EEL – Backbone	EEL Legend		UD					
PR-1-09	Av. Interval Offered – Total - EEL – Loop	EEL Legend		UD					
PR-1-09	Av. Interval Offered – Total - IOF	IOF Legend		14.87		99			
PR-1-10	Av. Interval Offered – Disconnects – No Dispatch	Parity with BA Retail	4.67	NA	846		4.62		
PR-1-11	Av. Interval Offered – Disconnects – Dispatch	Parity with BA Retail	7.50	NA	6		5.65		
	PR-2 - Average Completed Interval								
PR-2-01	Av. Interval Completed – Total No Dispatch	Parity with BA Retail	5.77	12.00	3962	11	4.37	1.32	-4.72
PR-2-02	Av. Interval Completed – Total Dispatch	Parity with BA Retail	8.63	11.57	1173	14	5.99	1.61	-1.20
PR-2-06	Av. Interval Completed – DS0	Parity with BA Retail	11.75	NA	237		8.65		
PR-2-07	Av. Interval Completed – DS1	Parity with BA Retail	7.56	9.71	3239	21	4.76	1.05	-2.05
PR-2-08	Av. Interval Completed – DS3	Parity with BA Retail	14.00	22.50	2	4	12.73	11.02	-0.77
PR-2-09	Av. Interval Completed – Total - EEL - Backbone	EEL Legend		UD					
PR-2-09	Av. Interval Completed – Total - EEL – Loop	EEL Legend		UD					
PR-2-09	Av. Interval Completed – Total - IOF	IOF Legend		14.91		32			
PR-2-10	Av. Interval Completed - Disconnects - No Dispatch	Parity with BA Retail	4.79	NA	822		3.77		
PR-2-11	Av. Interval Completed – Disconnects – Dispatch	Parity with BA Retail	7.50	NA	6		5.65		
	PR-4 - Missed Appointments								
PR-4-01	% Missed Appointment – BA – Total	Parity with BA Retail	0.86	2.13	6172	47		1.35	-0.84
PR-4-01	% Missed Appointment – BA – Total - EEL	Parity with BA Retail	0.86	UD	6172				
PR-4-01	% Missed Appointment – BA – Total- IOF	Parity with BA Retail	0.86	0.97	6172	103		0.62	-0.12
PR-4-02	Average Delay Days – Total	Parity with BA Retail	3.77	3.00	53	1	4.44	4.46	0.17
PR-4-02	Average Delay Days – Total - EEL	Parity with BA Retail	3.77	UD	53		4.44		
PR-4-02	Average Delay Days – Total - IOF	Parity with BA Retail	3.77	3.00	53	1	4.44	4.46	0.17
PR-4-03	% Missed Appointment – Customer	None: Analysis Only	7.37	24.04					
PR-4-03	% Missed Appointment – Customer - EEL	None: Analysis Only	7.37	UD					
PR-4-06	% Missed Appt. – Customer – Late Order Conf.	None: Analysis Only	0.00	0.00		47			
	PR-5 - Facility Missed Orders								
PR-5-01	% Missed Appointment – BA – Facilities	Parity with BA Retail	0.15	0.00	6172	47		0.57	0.26
PR-5-02	% Orders Held for Facilities > 15 Days	Parity with BA Retail	0.02	0.00	6172	47		0.21	0.10
PR-5-03	% Orders Held for Facilities > 60 Days	Parity with BA Retail	0.00	0.00	6172	47			
	PR-6 - Installation Quality								
PR-6-01	% Installation Troubles reported within 30 Days	Parity with BA for Found Troubles	0.63	0.00	11680	45		1.19	0.53
PR-6-03	% Inst. Troubles reported w/in 30 Days - FOK/TOK/CPE	None: Analysis Only	0.03	0.00	11680	45		0.24	0.11
	PR-7 - Jeopardy Reports								
PR-7-01	% Orders with Jeopardy Status - EEL	Jeopardy Legend		NA					

*Legend Notations defined on Legend sheet - last page

Carrier to Carrier
Performance Standards and Reports
Interim Guidelines May 2000
Bell Atlantic - Massachusetts

CLEC Aggregate Performance
MAINTENANCE - UNE POTS / SPECIAL SERVICES

Metric #		Standard	Actual Performance: BA	Actual Performance: CLEC Aggregate	Number of Observations: BA	Number of Observations: All CLECs	Standard Deviation	Sampling Error	Z-Score
	Maintenance - POTS Loop								
	MR-2 - Trouble Report Rate								
MR-2-02	Network Trouble Report Rate – Loop	Parity with BA Retail	1.25	1.30	4253865	21781		0.06	-0.68
MR-2-03	Network Trouble Report Rate – Central Office	Parity with BA Retail	0.09	0.10	4253865	21781		0.02	-0.16
MR-2-04	% Subsequent Reports	IC/W MRAs	19.21	12.14					
MR-2-05	% CPE/TOK/FOK Trouble Report Rate	None: Analysis Only	0.91	2.43	4253865	21781		0.06	-23.51
	MR-3 - Missed Repair Appointments								
MR-3-01	% Missed Repair Appointment – Loop	Parity with BA Retail	11.27	22.61	53082	283		1.88	-6.02
MR-3-02	% Missed Repair Appointment – Central Office	Parity with BA Retail	8.14	4.76	3958	21		5.98	0.56
MR-3-03	% CPE/TOK/FOK - Missed Appointment		8.13	17.36	38864	530		1.05	-10.70
MR-3-04	% Missed Repair Appoint - No Double Dispatch		6.77	16.61	3594	47		3.69	-2.67
MR-3-05	% Missed Repair appointment - Double Dispatch		3.91	3.53	2073	10		6.14	0.06
	MR-4 - Trouble Duration Intervals								
MR-4-01	Mean Time To Repair – Total	Parity with BA Retail	16.23	23.43	57040	304	17.67	1.02	-5.12
MR-4-02	Mean Time To Repair – Loop Trouble	Parity with BA Retail	16.88	24.88	53082	283	17.70	1.05	-5.69
MR-4-03	Mean Time To Repair – Central Office Trouble	Parity with BA Retail	9.53	3.90	3958	21	14.63	3.20	1.76
MR-4-04	% Cleared (all troubles) within 24 Hours	Parity with BA Retail	75.11	67.11	57040	304		2.49	-3.22
MR-4-07	% Out of Service > 12 Hours	Parity with BA Retail	57.86	62.89	44902	194		3.55	-1.42
MR-4-08	% Out of Service > 24 Hours	Parity with BA Retail	24.17	31.96	44902	194		3.08	-2.53
MR-4-09	Mean Time To Repair - No Double Dispatch	Parity with BA Retail	16.97	22.96	46415	273	17.67	1.07	-5.61
MR-4-10	Mean Time To Repair - Double Dispatch	Parity with BA Retail	35.23	50.16	5763	14	17.67	4.73	-3.16
	MR-5 - Repeat Trouble Reports								
MR-5-01	% Repeat Reports within 30 Days	Parity with BA Retail	19.08	16.45	57040	304		2.26	1.16
	Maintenance - POTS Platform								
	MR-2 - Trouble Report Rate								
MR-2-02	Network Trouble Report Rate – Platform	Parity with BA Retail	1.25	0.17	4253865	14012		0.09	11.46
MR-2-03	Network Trouble Report Rate – Central Office	Parity with BA Retail	0.09	0.06	4253865	14012		0.03	1.12
MR-2-04	% Subsequent Reports	IC/W MRAs	19.21	5.71					
MR-2-05	% CPE/TOK/FOK Trouble Report Rate	None: Analysis Only	0.91	0.19	4253865	14012		0.06	0.04
	MR-3 - Missed Repair Appointments								
MR-3-01	% Missed Repair Appointment – Platform	Parity with BA Retail	11.27	4.17	53082	24		6.46	1.10
MR-3-02	% Missed Repair Appointment – Central Office	Parity with BA Retail	8.14	0.00	3958	9		9.13	0.89
MR-3-03	% CPE/TOK/FOK - Missed Appointment - Platform		8.13	15.38	38864	26		4.71	-1.97
MR-3-04	% Missed Repair Appointment - No Double Dispatch		6.77	4.17	3594	1		25.13	0.10
MR-3-05	% Missed Repair Appointment - Double Dispatch		3.91	NA	2073				
	MR-4 - Trouble Duration Intervals								
MR-4-01	Mean Time To Repair – Total	Parity with BA Retail	16.23	15.38	57040	33	17.67	3.08	0.93
MR-4-02	Mean Time To Repair – Loop Trouble - Platform	Parity with BA Retail	16.88	17.50	53082	24	17.70	3.61	0.38
MR-4-03	Mean Time To Repair – Central Office Trouble	Parity with BA Retail	9.53	9.73	3958	9	14.63	4.88	-0.04
MR-4-04	% Cleared (all troubles) within 24 Hours	Parity with BA Retail	75.11	75.76	57040	33		7.53	0.09
MR-4-06	% Out of Service > 4 Hours	Parity with BA Retail	82.17	83.33	44902	24		7.82	-0.15
MR-4-07	% Out of Service > 12 Hours	Parity with BA Retail	57.86	66.67	44902	24		10.06	-0.87
MR-4-08	% Out of Service > 24 Hours	Parity with BA Retail	24.17	29.17	44902	24		8.74	-0.57
	MR-5 - Repeat Trouble Reports								
MR-5-01	% Repeat Reports within 30 Days	Parity with BA Retail	19.08	15.15	57040	33		6.84	0.57
	2-Wire Digital Services - Maintenance								
	MR-2 - Trouble Report Rate								
MR-2-02	Network Trouble Report Rate - Loop	Parity with BA Retail	1.25	1.27	4253865	4060		0.17	-0.11
MR-2-03	Network Trouble Report Rate - Central Office	Parity with BA Retail	0.09	0.22	4253865	4060		0.05	-2.61
MR-2-05	% CPE/TOK/FOK Trouble Report Rate	None: Analysis Only	0.91	1.79	4253865	4060		0.15	-5.85
	MR-3 - Missed Repair Appointments								
MR-3-01	% Missed Repair Appointment – Loop	Parity with BA Retail	38.05	15.23	205	151		5.21	4.38
	MR-4 - Trouble Duration Intervals								
MR-4-01	Mean Time To Repair - Total	Parity with BA Retail	24.38	46.65	304	177	28.85	2.73	-8.16
MR-4-02	Mean Time To Repair - Loop Trouble	Parity with BA Retail	27.85	50.80	205	151	28.30	3.03	-7.56
MR-4-03	Mean Time To Repair - Central Office Trouble	Parity with BA Retail	17.03	21.85	99	26	28.73	6.33	-0.78
MR-4-06	% Out of Service > 24 Hours	Parity with BA Retail	34.45	62.50	119	80		6.87	-4.06
MR-4-09	Mean Time To Repair - No Double Dispatch	Parity with BA Retail	16.25	35.50	170	126	28.85	3.39	-5.66
MR-4-10	Mean Time To Repair - Double Dispatch	Parity with BA Retail	39.13	75.67	115	49	28.85	4.92	-7.42
	MR-5 - Repeat Trouble Reports								
MR-5-01	% Repeat Reports within 30 Days	Parity with BA Retail	16.45	20.90	304	177		3.51	-1.27
	2-Wire xDSL Services - Maintenance								
	MR-2 - Trouble Report Rate								
MR-2-02	Network Trouble Report Rate - Loop	Parity with BA Retail	1.25	2.33	4253865	7659		0.13	-8.65
MR-2-03	Network Trouble Report Rate - Central Office	Parity with BA Retail	0.09	0.34	4253865	7659		0.03	-7.29
MR-2-05	% CPE/TOK/FOK Trouble Report Rate	None: Analysis Only	0.91	3.70	4253865	7659		0.11	-25.94
	MR-3 - Missed Repair Appointments								
MR-3-01	% Missed Repair Appointment – Loop	Parity with BA Retail	9.50	20.14	242	278		2.58	-4.13
	MR-4 - Trouble Duration Intervals								
MR-4-01	Mean Time To Repair - Total	Parity with BA Retail	20.02	46.63	293	319	17.85	1.44	-18.43
MR-4-02	Mean Time To Repair - Loop Trouble	Parity with BA Retail	21.60	50.72	242	278	18.15	1.60	-18.25
MR-4-03	Mean Time To Repair - Central Office Trouble	Parity with BA Retail	12.48	16.93	51	41	14.25	2.99	-2.16
MR-4-06	% Out of Service > 24 Hours	Parity with BA Retail	28.10	58.73	242	189		4.36	-7.02
MR-4-09	Mean Time To Repair - No Double Dispatch	Parity with BA Retail	16.77	39.07	233	215	17.85	1.69	-7.88
MR-4-10	Mean Time To Repair - Double Dispatch	Parity with BA Retail	33.72	83.93	54	99	17.85	3.02	-16.63
	MR-5 - Repeat Trouble Reports								
MR-5-01	% Repeat Reports within 30 Days	Parity with BA Retail	26.96	14.42	293	319		3.59	3.49

continued

Carrier to Carrier
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CLEC Aggregate Performance
PROVISIONING - UNE POTS / SPECIAL SERVICES continued

Metric #		Standard	Actual Performance BA	Actual Performance CLEC Aggregate	Number of Observations BA	Number of Observations All CLECs	Standard Deviation	Sampling Error	Z-Score
	2-Wire xDSL Services								
	PR-1 - Average Interval Offered								
PR-1-01	Av. Interval Offered – Total No Dispatch	Parity with BA Retail	5.54	6.56	3219	801	3.17	0.13	-8.15
PR-1-02	Av. Interval Offered – Total Dispatch	Parity with BA Retail	6.66	6.96	652	1422	1.84	0.09	-3.45
	PR-2 - Average Completed Interval								
PR-2-01	Av. Interval Completed – Total No Dispatch	Parity with BA Retail	5.54	4.07	2663	151	3.54	0.30	4.97
PR-2-02	Av. Interval Completed – Total Dispatch	Parity with BA Retail	6.69	7.16	551	1193	2.27	0.12	-4.02
	PR-4 - Missed Appointments								
PR-4-02	Average Delay Days – Total	Parity with BA Retail	2.65	3.57	26	72	2.54	0.56	-1.58
PR-4-03	% Missed Appointment – Customer	None: Analysis Only	3.06	12.53					
PR-4-04	% Missed Appointment – BA – Dispatch	Parity with BA Retail	2.16	3.55	694	2027		0.64	-2.17
PR-4-05	% Missed Appointment – BA – No Dispatch	Parity with BA Retail	0.35	NA	3135				
PR-4-06	% Missed Appt. – Customer – Late Order Conf.	None: Analysis Only		0.20		2027			
PR-4-14	% Completed On Time - Complex (DO-2 Test & Serial Number)	95% on Time		89.45		787			
PR-4-15	% Completed On Time - Complex (DO-2 Test Total)	95% on Time		92.36		787			
PR-4-16	% Completed On Time - Complex (No DO-2 Test & Serial Number)	95% on Time		86.09		596			
PR-4-17	% Completed On Time - Complex (No DO-2 Test & 800# Provided)	95% on Time		93.45		667			
PR-4-18	% Completed On Time - Cmplx (No DO-2 Test & No 800# Provided)	95% on Time		NA					
	PR-5 - Facility Missed Orders								
PR-5-01	% Missed Appointment - Bell Atlantic - Facilities	Parity with BA Retail	0.05	2.71	3629	2027		0.06	-43.32
PR-5-02	% Orders Held for Facilities > 15 Days	Parity with BA Retail	0.00	0.00	3629	2027			
PR-5-03	% Orders Held for Facilities > 60 Days	Parity with BA Retail	0.00	0.00	3629	2027			
	PR-6 - Installation Quality								
PR-6-01	% Install. Troubles Reported within 30 Days	Parity with BA Retail	2.34	8.20	3668	1638		0.43	-8.92
PR-6-03	% Install. Troubles Reported within 30 Days - FOK/TOK/CPE	Parity with BA Retail	2.02	9.85	3668	1638		0.40	-19.49
	Special Services - Provisioning								
	PR-1 - Average Interval Offered								
PR-1-01	Av. Interval Offered – Total No Dispatch	Parity with BA Retail	5.36	23.62	5177	39	4.06	0.65	-27.65
PR-1-02	Av. Interval Offered – Total Dispatch	Parity with BA Retail	8.20	13.21	1665	67	5.56	0.75	-6.34
PR-1-06	Av. Interval Offered – DS0	Parity with BA Retail	6.85	NA	600		6.26		
PR-1-07	Av. Interval Offered – DS1	Parity with BA Retail	13.15	12.84	394	67	8.64	1.14	0.27
PR-1-08	Av. Interval Offered – DS3	Parity with BA Retail	15.00	20.07	1	29			
PR-1-09	Av. Interval Offered – Total - EEL – Backbone	EEL Legend		UD					
PR-1-09	Av. Interval Offered – Total - EEL – Loop	EEL Legend		UD					
PR-1-09	Av. Interval Offered – Total - IOF	IOF Legend		15.21		155			
PR-1-10	Av. Interval Offered – Disconnects – No Dispatch	Parity with BA Retail	4.69	NA	936		4.23		
PR-1-11	Av. Interval Offered – Disconnects – Dispatch	Parity with BA Retail	3.00	NA	1				
	PR-2 - Average Completed Interval								
PR-2-01	Av. Interval Completed – Total No Dispatch	Parity with BA Retail	4.95	26.54	4350	24	3.65	0.75	-28.88
PR-2-02	Av. Interval Completed – Total Dispatch	Parity with BA Retail	8.99	13.09	1294	43	6.07	0.93	-4.43
PR-2-06	Av. Interval Completed – DS0	Parity with BA Retail	6.05	NA	449		6.07		
PR-2-07	Av. Interval Completed – DS1	Parity with BA Retail	11.81	12.86	222	43	8.15	1.52	-0.69
PR-2-08	Av. Interval Completed – DS3	Parity with BA Retail	NA	26.96		24			
PR-2-09	Av. Interval Completed – Total - EEL - Backbone	EEL Legend		UD					
PR-2-09	Av. Interval Completed – Total - EEL – Loop	EEL Legend		UD					
PR-2-09	Av. Interval Completed – Total - IOF	IOF Legend		17.71		105			
PR-2-10	Av. Interval Completed - Disconnects - No Dispatch	Parity with BA Retail	4.39	NA	835		3.64		
PR-2-11	Av. Interval Completed – Disconnects – Dispatch	Parity with BA Retail	3.00	NA	1				
	PR-4 - Missed Appointments								
PR-4-01	% Missed Appointment – BA – Total	Parity with BA Retail	0.85	1.12	6600	89		0.98	-0.28
PR-4-01	% Missed Appointment – BA – Total - EEL	Parity with BA Retail	0.85	UD	6600				
PR-4-01	% Missed Appointment – BA – Total- IOF	Parity with BA Retail	0.85	3.95	6600	177		0.70	-4.43
PR-4-02	Average Delay Days – Total	Parity with BA Retail	3.71	3.00	56	1	3.51	3.54	0.20
PR-4-02	Average Delay Days – Total - EEL	Parity with BA Retail	3.71	UD	56		3.51		
PR-4-02	Average Delay Days – Total - IOF	Parity with BA Retail	3.71	27.29	56	7	3.51	1.41	-16.76
PR-4-03	% Missed Appointment – Customer	None: Analysis Only	6.03	21.35					
PR-4-03	% Missed Appointment – Customer - EEL	None: Analysis Only	6.03	UD					
PR-4-06	% Missed Appt. – Customer – Late Order Conf.	None: Analysis Only		0.00		89			
	PR-5 - Facility Missed Orders								
PR-5-01	% Missed Appointment – BA – Facilities	Parity with BA Retail	0.14	0.00	6600	89		0.40	0.35
PR-5-02	% Orders Held for Facilities > 15 Days	Parity with BA Retail	0.02	0.00	6600	89		0.15	0.13
PR-5-03	% Orders Held for Facilities > 60 Days	Parity with BA Retail	0.00	0.00	6600	89			
	PR-6 - Installation Quality								
PR-6-01	% Installation Troubles reported within 30 Days	Parity with BA Retail	0.94	0.00	12705	89		1.03	0.92
PR-6-03	% Inst. Troubles reported w/ in 30 Days - FOK/TOK/CPE	None: Analysis Only	0.01	0.00	12705	89		0.09	0.08
	PR-7 - Jeopardy Reports								
PR-7-01	% Orders with Jeopardy Status - EEL	Jeopardy Legend		NA					

*Legend Notations defined on Legend sheet - last page

Carrier to Carrier
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Bell Atlantic - Massachusetts

CLEC Aggregate Performance
MAINTENANCE - UNE POTS / SPECIAL SERVICES

Metric #		Standard	Actual Performance BA	Actual Performance CLEC Aggregate	Number of Observations BA	Number of Observations All CLECs	Standard Deviation	Sampling Error	Z-Score
	Maintenance - POTS Loop								
	MR-2 - Trouble Report Rate								
MR-2-02	Network Trouble Report Rate – Loop	Parity with BA Retail	1.39	1.29	4234309	24604		0.07	1.36
MR-2-03	Network Trouble Report Rate – Central Office	Parity with BA Retail	0.10	0.24	4234309	24604		0.02	-6.85
MR-2-04	% Subsequent Reports	I/C/W MRAs	21.76	13.99					
MR-2-05	% CPE/TOK/FOK Trouble Report Rate	None: Analysis Only	1.06	2.59	4234309	24604		0.07	-23.26
	MR-3 - Missed Repair Appointments								
MR-3-01	% Missed Repair Appointment – Loop	Parity with BA Retail	11.41	23.66	58861	317		1.79	-6.84
MR-3-02	% Missed Repair Appointment – Central Office	Parity with BA Retail	7.76	3.45	4167	58		3.54	1.22
MR-3-03	% CPE/TOK/FOK - Missed Appointment		6.05	16.81	45095	638		0.95	-13.42
MR-3-04	% Missed Repair Appoint - No Double Dispatch		6.67	19.24	3928	61		3.22	-3.90
MR-3-05	% Missed Repair appointment - Double Dispatch		3.67	3.15	2159	10		5.96	0.09
	MR-4 - Trouble Duration Intervals								
MR-4-01	Mean Time To Repair – Total	Parity with BA Retail	20.27	24.62	63028	375	16.73	0.97	-4.48
MR-4-02	Mean Time To Repair – Loop Trouble	Parity with BA Retail	20.98	27.56	58861	317	16.73	1.05	-6.26
MR-4-03	Mean Time To Repair – Central Office Trouble	Parity with BA Retail	10.37	8.35	4167	58	15.63	2.07	0.98
MR-4-04	% Cleared (all troubles) within 24 Hours	Parity with BA Retail	69.29	64.80	63028	375		2.39	-1.88
MR-4-07	% Out of Service > 12 Hours	Parity with BA Retail	62.07	77.05	49881	244		3.11	-4.81
MR-4-08	% Out of Service > 24 Hours	Parity with BA Retail	30.45	35.66	49881	244		2.95	-1.76
MR-4-09	Mean Time To Repair - No Double Dispatch	Parity with BA Retail	19.15	23.57	49966	346	16.73	1.01	-4.38
MR-4-10	Mean Time To Repair - Double Dispatch	Parity with BA Retail	37.30	48.90	6372	17	16.73	4.55	-2.55
	MR-5 - Repeat Trouble Reports								
MR-5-01	% Repeat Reports within 30 Days	Parity with BA Retail	18.70	16.53	63028	375		2.02	1.07
	Maintenance - POTS Platform								
	MR-2 - Trouble Report Rate								
MR-2-02	Network Trouble Report Rate – Platform	Parity with BA Retail	1.39	0.33	4234309	15917		0.09	11.44
MR-2-03	Network Trouble Report Rate – Central Office	Parity with BA Retail	0.10	0.10	4234309	15917		0.02	-0.06
MR-2-04	% Subsequent Reports	I/C/W MRAs	21.76	6.85					
MR-2-05	% CPE/TOK/FOK Trouble Report Rate	None: Analysis Only	1.06	0.42	4234309	15917		0.06	7.90
	MR-3 - Missed Repair Appointments								
MR-3-01	% Missed Repair Appointment – Platform	Parity with BA Retail	11.41	11.54	58861	52		4.41	-0.03
MR-3-02	% Missed Repair Appointment – Central Office	Parity with BA Retail	7.76	6.25	4167	16		6.71	0.23
MR-3-03	% CPE/TOK/FOK - Missed Appointment - Platform		6.05	11.94	45095	67		2.91	-2.02
MR-3-04	% Missed Repair Appointment - No Double Dispatch		6.67	7.69	3928	4		12.46	-0.08
MR-3-05	% Missed Repair Appointment - Double Dispatch		3.67	1.92	2159	1		18.81	0.09
	MR-4 - Trouble Duration Intervals								
MR-4-01	Mean Time To Repair – Total	Parity with BA Retail	20.27	16.80	63028	68	16.73	2.27	1.53
MR-4-02	Mean Time To Repair – Loop Trouble - Platform	Parity with BA Retail	20.98	20.10	58861	52	16.73	2.60	0.34
MR-4-03	Mean Time To Repair – Central Office Trouble	Parity with BA Retail	10.37	6.05	4167	16	15.63	3.92	1.10
MR-4-04	% Cleared (all troubles) within 24 Hours	Parity with BA Retail	69.29	70.59	63028	68		5.60	0.23
MR-4-06	% Out of Service > 4 Hours	Parity with BA Retail	85.58	82.46	49881	57		4.66	0.67
MR-4-07	% Out of Service > 12 Hours	Parity with BA Retail	62.07	56.14	49881	57		6.43	0.92
MR-4-08	% Out of Service > 24 Hours	Parity with BA Retail	30.45	33.33	49881	57		6.10	-0.47
	MR-5 - Repeat Trouble Reports								
MR-5-01	% Repeat Reports within 30 Days	Parity with BA Retail	18.70	11.76	63028	68		4.73	1.47
	2-Wire Digital Services - Maintenance								
	MR-2 - Trouble Report Rate								
MR-2-02	Network Trouble Report Rate - Loop	Parity with BA Retail	1.39	2.74	4234309	4266		0.18	-7.54
MR-2-03	Network Trouble Report Rate - Central Office	Parity with BA Retail	0.10	0.38	4234309	4266		0.05	-5.76
MR-2-05	% CPE/TOK/FOK Trouble Report Rate	None: Analysis Only	1.06	4.76	4234309	4266		0.16	-23.49
	MR-3 - Missed Repair Appointments								
MR-3-01	% Missed Repair Appointment – Loop	Parity with BA Retail	45.29	26.50	170	117		5.98	3.14
	MR-4 - Trouble Duration Intervals								
MR-4-01	Mean Time To Repair - Total	Parity with BA Retail	26.22	41.52	261	133	33.22	3.50	-4.38
MR-4-02	Mean Time To Repair - Loop Trouble	Parity with BA Retail	31.62	43.22	170	117	35.28	4.24	-2.74
MR-4-03	Mean Time To Repair - Central Office Trouble	Parity with BA Retail	16.15	29.10	111	16	26.12	7.52	-1.46
MR-4-06	% Out of Service > 24 Hours	Parity with BA Retail	34.09	58.06	132	93		6.42	-3.74
MR-4-09	Mean Time To Repair - No Double Dispatch	Parity with BA Retail	15.70	29.92	142	88	33.22	4.51	-3.15
MR-4-10	Mean Time To Repair - Double Dispatch	Parity with BA Retail	44.70	65.57	103	44	33.22	5.96	-3.49
	MR-5 - Repeat Trouble Reports								
MR-5-01	% Repeat Reports within 30 Days	Parity with BA Retail	16.15	27.07	261	133		4.06	-2.20
	2-Wire xDSL Services - Maintenance								
	MR-2 - Trouble Report Rate								
MR-2-02	Network Trouble Report Rate - Loop	Parity with BA Retail	1.39	3.08	4234309	9458		0.12	-13.99
MR-2-03	Network Trouble Report Rate - Central Office	Parity with BA Retail	0.10	0.50	4234309	9458		0.03	-12.35
MR-2-05	% CPE/TOK/FOK Trouble Report Rate	None: Analysis Only	1.06	5.34	4234309	9458		0.11	-40.45
	MR-3 - Missed Repair Appointments								
MR-3-01	% Missed Repair Appointment – Loop	Parity with BA Retail	13.09	18.90	191	291		3.14	-1.85
	MR-4 - Trouble Duration Intervals								
MR-4-01	Mean Time To Repair - Total	Parity with BA Retail	22.65	44.92	233	338	19.88	1.69	-13.15
MR-4-02	Mean Time To Repair - Loop Trouble	Parity with BA Retail	24.33	48.63	191	291	20.70	1.93	-12.61
MR-4-03	Mean Time To Repair - Central Office Trouble	Parity with BA Retail	14.98	21.93	42	47	13.27	2.82	-2.47
MR-4-06	% Out of Service > 24 Hours	Parity with BA Retail	34.57	52.94	188	221		4.72	-3.89
MR-4-09	Mean Time To Repair - No Double Dispatch	Parity with BA Retail	19.80	29.32	162	235	19.88	1.96	-4.85
MR-4-10	Mean Time To Repair - Double Dispatch	Parity with BA Retail	38.55	61.37	39	100	19.88	3.75	-11.41
	MR-5 - Repeat Trouble Reports								
MR-5-01	% Repeat Reports within 30 Days	Parity with BA Retail	28.76	14.79	233	338		3.65	3.62

continued

Carrier to Carrier
Performance Standards and Reports
Interim Guidelines July 2000
VERIZON Massachusetts

CLEC Aggregate Performance
PROVISIONING - UNE POTS / SPECIAL SERVICES continued

Metric #	2-Wire xDSL Services	Standard	Actual Performance VZ	Actual Performance CLEC Aggregate	Number of Observations VZ	Number of Observations All CLECs	Standard Deviation	Sampling Error	Z-Score
	PR-1 - Average Interval Offered								
PR-1-01	Av. Interval Offered – Total No Dispatch	Parity with VZ Retail	4.79	5.96	3622	785	2.61	0.10	-11.39
PR-1-02	Av. Interval Offered – Total Dispatch	Parity with VZ Retail	5.75	6.84	574	846	1.80	0.10	-11.20
	PR-2 - Average Completed Interval								
PR-2-01	Av. Interval Completed – Total No Dispatch	Parity with VZ Retail	4.70	3.79	3246	198	2.52	0.18	4.93
PR-2-02	Av. Interval Completed – Total Dispatch	Parity with VZ Retail	5.93	7.14	496	694	2.20	0.13	-9.35
	PR-3 - Completed within X Days								
PR-3-10	% Completed in 6 Days (1-5 Lines - Total)	Parity with VZ Retail	83.12	51.45	8621	723		1.45	-21.84
	PR-4 - Missed Appointments								
PR-4-02	Average Delay Days – Total	Parity with VZ Retail	3.31	3.44	13	59	2.36	0.72	-0.18
PR-4-03	% Missed Appointment – Customer	None: Analysis Only	1.62	13.19					
PR-4-04	% Missed Appointment – VZ – Dispatch	Parity with VZ Retail	2.04	3.40	637	1736		0.65	-2.08
PR-4-05	% Missed Appointment – VZ – No Dispatch	Parity with VZ Retail	0.00	NA	3379				
PR-4-06	% Missed Appt. – Customer – Late Order Conf.	None: Analysis Only		0.46		1736			
PR-4-14	% Completed On Time - Complex (DD-2 Test & Serial Number)	95% on Time		90.00		620			
PR-4-15	% Completed On Time - Complex (DD-2 Test Total)	95% on Time		92.58		620			
PR-4-16	% Completed On Time - Complex (No DD-2 Test & Serial Number)	95% on Time		90.67		416			
PR-4-17	% Completed On Time - Complex (No DD-2 Test & 800# Provided)	95% on Time		94.96		496			
PR-4-18	% Completed On Time - Cmplx (No DD-2 Test & No 800# Provided)	95% on Time		NA					
	PR-5 - Facility Missed Orders								
PR-5-01	% Missed Appointment - VERIZON Facilities	Parity with VZ Retail	0.15	2.88	4016	1736		0.11	-24.56
PR-5-02	% Orders Held for Facilities > 15 Days	Parity with VZ Retail	0.00	0.00	4016	1736			
PR-5-03	% Orders Held for Facilities > 60 Days	Parity with VZ Retail	0.00	0.00	4016	1736			
	PR-6 - Installation Quality								
PR-6-01	% Install. Troubles Reported within 30 Days	Parity with VZ Retail	2.97	8.46	3837	1465		0.52	-10.53
PR-6-03	% Install. Troubles Reported within 30 Days - FOK/TOK/CPE	Parity with VZ Retail	2.58	10.92	3837	1465		0.49	-17.13
	Special Services - Provisioning								
	PR-1 - Average Interval Offered								
PR-1-01	Av. Interval Offered – Total No Dispatch	Parity with VZ Retail	4.96	16.32	5555	22	4.02	0.86	-13.23
PR-1-02	Av. Interval Offered – Total Dispatch	Parity with VZ Retail	10.93	13.00	1584	18	9.15	2.17	-0.95
PR-1-06	Av. Interval Offered – DS0	Parity with VZ Retail	6.64	NA	571		4.74		
PR-1-07	Av. Interval Offered – DS1	Parity with VZ Retail	19.11	12.93	497	30	11.31	2.13	2.91
PR-1-08	Av. Interval Offered – DS3	Parity with VZ Retail	14.00	20.50	3	10	1.73	1.14	-5.71
PR-1-09	Av. Interval Offered – Total - EEL – Backbone	EEL Legend		UD					
PR-1-09	Av. Interval Offered – Total - EEL – Loop	EEL Legend		UD					
PR-1-09	Av. Interval Offered – Total - IOF	IOF Legend		13.14		28			
PR-1-10	Av. Interval Offered – Disconnects – No Dispatch	Parity with VZ Retail	5.85	NA	916		7.22		
PR-1-11	Av. Interval Offered – Disconnects – Dispatch	Parity with VZ Retail	7.00	NA	2		2.83		
	PR-2 - Average Completed Interval								
PR-2-01	Av. Interval Completed – Total No Dispatch	Parity with VZ Retail	4.55	21.33	4589	3	3.29	1.90	-8.83
PR-2-02	Av. Interval Completed – Total Dispatch	Parity with VZ Retail	10.63	14.92	1195	12	9.25	2.68	-1.60
PR-2-06	Av. Interval Completed – DS0	Parity with VZ Retail	5.74	NA	363		4.54		
PR-2-07	Av. Interval Completed – DS1	Parity with VZ Retail	19.95	14.23	309	13	12.06	3.41	1.68
PR-2-08	Av. Interval Completed – DS3	Parity with VZ Retail	12.00	29.00	1	2			
PR-2-09	Av. Interval Completed – Total - EEL - Backbone	EEL Legend		UD					
PR-2-09	Av. Interval Completed – Total - EEL – Loop	EEL Legend		UD					
PR-2-09	Av. Interval Completed – Total - IOF	IOF Legend		11.40		10			
PR-2-10	Av. Interval Completed - Disconnects - No Dispatch	Parity with VZ Retail	5.08	NA	786		4.73		
PR-2-11	Av. Interval Completed – Disconnects – Dispatch	Parity with VZ Retail	7.00	NA	2		2.83		
	PR-4 - Missed Appointments								
PR-4-01	% Missed Appointment – VZ – Total	Parity with VZ Retail	1.06	7.41	6726	27		1.97	-3.22
PR-4-01	% Missed Appointment – VZ – Total - EEL	Parity with VZ Retail	1.06	UD*	6726				
PR-4-01	% Missed Appointment – VZ – Total- IOF	Parity with VZ Retail	1.06	0.00	6726	21		2.24	0.47
PR-4-02	Average Delay Days – Total	Parity with VZ Retail	6.51	3.50	71	2	7.75	5.56	0.54
PR-4-02	Average Delay Days – Total - EEL	Parity with VZ Retail	6.51	UD	71		7.75		
PR-4-02	Average Delay Days – Total - IOF	Parity with VZ Retail	6.51	NA	71		7.75		
PR-4-03	% Missed Appointment – Customer	None: Analysis Only	6.14	44.44					
PR-4-03	% Missed Appointment – Customer - EEL	None: Analysis Only	6.14	UD					
PR-4-06	% Missed Appt. – Customer – Late Order Conf.	None: Analysis Only		0.00		27			
	PR-5 - Facility Missed Orders								
PR-5-01	% Missed Appointment – VZ – Facilities	Parity with VZ Retail	0.24	0.00	6726	27		0.94	0.25
PR-5-02	% Orders Held for Facilities > 15 Days	Parity with VZ Retail	0.01	0.00	6726	27		0.19	0.05
PR-5-03	% Orders Held for Facilities > 60 Days	Parity with VZ Retail	0.00	0.00	6726	27			
	PR-6 - Installation Quality								
PR-6-01	% Installation Troubles reported within 30 Days	Parity with VZ Retail	0.75	30.77	11957	26		1.70	-17.69
PR-6-03	% Inst. Troubles reported w/ in 30 Days - FOK/TOK/CPE	None: Analysis Only	0.04	0.00	11957	26		0.40	0.10
	PR-7 - Jeopardy Reports								
PR-7-01	% Orders with Jeopardy Status - EEL	Jeopardy Legend		UD					

*Legend Notations defined on Legend sheet - last page

Carrier to Carrier
Performance Standards and Reports
Interim Guidelines July 2000
VERIZON Massachusetts

CLEC Aggregate Performance
MAINTENANCE - UNE POTS / SPECIAL SERVICES

Metric #		Standard	Actual Performance VZ	Actual Performance CLEC Aggregate	Number of Observations VZ	Number of Observations All CLECs	Standard Deviation	Sampling Error	Z-Score
	Maintenance - POTS Loop								
	MR-2 - Trouble Report Rate								
MR-2-02	Network Trouble Report Rate – Loop	Parity with VZ Retail	1.23	0.88	4221461	27892		0.07	5.30
MR-2-03	Network Trouble Report Rate – Central Office	Parity with VZ Retail	0.10	0.13	4221461	27892		0.02	-1.26
MR-2-04	% Subsequent Reports	I/C/W MRAs	22.84	21.13					
MR-2-05	% CPE/TOK/FOK Trouble Report Rate	None: Analysis Only	0.95	1.44	4221461	27892		0.06	-8.54
	MR-3 - Missed Repair Appointments								
MR-3-01	% Missed Repair Appointment – Loop	Parity with VZ Retail	11.72	26.94	51888	245		2.06	-7.39
MR-3-02	% Missed Repair Appointment – Central Office	Parity with VZ Retail	6.85	17.14	4277	35		4.29	-2.40
MR-3-03	% CPE/TOK/FOK - Missed Appointment		7.01	10.95	39897	402		1.26	-3.08
MR-3-04	% Missed Repair Appoint - No Double Dispatch		6.62	22.86	3434	56		3.35	-4.85
MR-3-05	% Missed Repair apppointment - Double Dispatch		4.22	3.67	2191	9		6.72	0.08
	MR-4 - Trouble Duration Intervals								
MR-4-01	Mean Time To Repair – Total	Parity with VZ Retail	20.43	26.57	56165	280	19.82	1.19	-5.17
MR-4-02	Mean Time To Repair – Loop Trouble	Parity with VZ Retail	21.30	26.33	51888	245	19.87	1.27	-5.53
MR-4-03	Mean Time To Repair – Central Office Trouble	Parity with VZ Retail	9.82	14.20	4277	35	15.87	2.69	-1.63
MR-4-04	% Cleared (all troubles) within 24 Hours	Parity with VZ Retail	68.72	65.71	56165	280		2.78	-1.08
MR-4-07	% Out of Service > 12 Hours	Parity with VZ Retail	61.97	69.09	43323	220		3.28	-2.17
MR-4-08	% Out of Service > 24 Hours	Parity with VZ Retail	30.67	31.82	43323	220		3.12	-0.37
MR-4-09	Mean Time To Repair - No Double Dispatch	Parity with VZ Retail	18.88	26.52	56165	280	19.82	1.19	-6.43
MR-4-10	Mean Time To Repair - Double Dispatch	Parity with VZ Retail	39.02	37.75	56165	280	19.82	1.19	1.07
	MR-5 - Repeat Trouble Reports								
MR-5-01	% Repeat Reports within 30 Days	Parity with VZ Retail	19.43	14.29	56165	280		2.37	2.17
	Maintenance - POTS Platform								
	MR-2 - Trouble Report Rate								
MR-2-02	Network Trouble Report Rate – Platform	Parity with VZ Retail	1.23	0.39	4221461	18450		0.08	10.32
MR-2-03	Network Trouble Report Rate – Central Office	Parity with VZ Retail	0.10	0.16	4221461	18450		0.02	-2.38
MR-2-04	% Subsequent Reports	I/C/W MRAs	22.84	17.89					
MR-2-05	% CPE/TOK/FOK Trouble Report Rate	None: Analysis Only	0.95	0.73	4221461	18450		0.07	3.07
	MR-3 - Missed Repair Appointments								
MR-3-01	% Missed Repair Appointment – Platform	Parity with VZ Retail	11.72	12.50	51888	72		3.79	-0.21
MR-3-02	% Missed Repair Appointment – Central Office	Parity with VZ Retail	6.85	10.34	4277	29		4.71	-0.74
MR-3-03	% CPE/TOK/FOK - Missed Appointment - Platform		7.01	11.19	39897	134		2.21	-1.89
MR-3-04	% Missed Repair Appointment - No Double Dispatch		6.62	2.78	3434	2		17.59	0.22
MR-3-05	% Missed Repair Appointment - Double Dispatch		4.22	9.72	2191	7		7.61	-0.72
	MR-4 - Trouble Duration Intervals								
MR-4-01	Mean Time To Repair – Total	Parity with VZ Retail	20.43	18.32	56165	101	19.82	1.97	1.07
MR-4-02	Mean Time To Repair – Loop Trouble - Platform	Parity with VZ Retail	21.30	21.88	51888	72	19.87	2.34	-0.25
MR-4-03	Mean Time To Repair – Central Office Trouble	Parity with VZ Retail	9.82	9.45	4277	29	15.87	2.96	0.12
MR-4-04	% Cleared (all troubles) within 24 Hours	Parity with VZ Retail	68.72	77.23	56165	101		4.62	1.84
MR-4-06	% Out of Service > 4 Hours	Parity with VZ Retail	84.52	77.22	43323	79		4.07	1.79
MR-4-07	% Out of Service > 12 Hours	Parity with VZ Retail	61.97	56.96	43323	79		5.47	0.92
MR-4-08	% Out of Service > 24 Hours	Parity with VZ Retail	30.67	25.32	43323	79		5.19	1.03
	MR-5 - Repeat Trouble Reports								
MR-5-01	% Repeat Reports within 30 Days	Parity with VZ Retail	19.43	16.83	56165	101		3.94	0.66
	2-Wire Digital Services - Maintenance								
	MR-2 - Trouble Report Rate								
MR-2-02	Network Trouble Report Rate - Loop	Parity with VZ Retail	1.23	1.96	4221461	4491		0.16	-4.44
MR-2-03	Network Trouble Report Rate - Central Office	Parity with VZ Retail	0.10	0.40	4221461	4491		0.05	-6.30
MR-2-05	% CPE/TOK/FOK Trouble Report Rate	None: Analysis Only	0.95	4.30	4221461				
	MR-3 - Missed Repair Appointments								
MR-3-01	% Missed Repair Appointment – Loop	Parity with VZ Retail	44.09	19.32	127	88		6.89	3.60
	MR-4 - Trouble Duration Intervals								
MR-4-01	Mean Time To Repair - Total	Parity with VZ Retail	31.10	56.03	204	106	44.32	5.31	-4.70
MR-4-02	Mean Time To Repair - Loop Trouble	Parity with VZ Retail	34.90	61.42	127	88	49.88	6.92	-3.85
MR-4-03	Mean Time To Repair - Central Office Trouble	Parity with VZ Retail	24.78	29.20	77	18	32.37	8.47	-0.52
MR-4-06	% Out of Service > 24 Hours	Parity with VZ Retail	31.82	54.24	88	59		7.84	-2.86
MR-4-09	Mean Time To Repair - No Double Dispatch	Parity with VZ Retail	20.40	49.87	204	106	44.32	5.31	-5.55
MR-4-10	Mean Time To Repair - Double Dispatch	Parity with VZ Retail	46.13	67.30	204	106	44.32	5.31	-3.99
	MR-5 - Repeat Trouble Reports								
MR-5-01	% Repeat Reports within 30 Days	Parity with VZ Retail	13.73	26.42	204	106		4.12	-3.08
	2-Wire xDSL Services - Maintenance								
	MR-2 - Trouble Report Rate								
MR-2-02	Network Trouble Report Rate - Loop	Parity with VZ Retail	1.23	2.77	4221461	10723		0.11	-14.46
MR-2-03	Network Trouble Report Rate - Central Office	Parity with VZ Retail	0.10	0.39	4221461	10723		0.03	-9.44
MR-2-05	% CPE/TOK/FOK Trouble Report Rate	None: Analysis Only	0.95	4.24	4221461	10723		0.09	-35.25
	MR-3 - Missed Repair Appointments								
MR-3-01	% Missed Repair Appointment – Loop	Parity with VZ Retail	16.62	19.19	355	297		2.93	-0.88
	MR-4 - Trouble Duration Intervals								
MR-4-01	Mean Time To Repair - Total	Parity with VZ Retail	24.93	45.37	392	339	26.02	1.93	-10.59
MR-4-02	Mean Time To Repair - Loop Trouble	Parity with VZ Retail	26.58	49.78	355	297	26.57	2.09	-11.11
MR-4-03	Mean Time To Repair - Central Office Trouble	Parity with VZ Retail	9.20	14.03	37	42	11.73	2.65	-1.83
MR-4-06	% Out of Service > 24 Hours	Parity with VZ Retail	37.38	51.05	305	239		4.16	-3.27
MR-4-09	Mean Time To Repair - No Double Dispatch	Parity with VZ Retail	20.80	27.82	392	339	26.02	1.93	-3.64
MR-4-10	Mean Time To Repair - Double Dispatch	Parity with VZ Retail	49.15	78.47	392	339	26.02	1.93	-15.19
	MR-5 - Repeat Trouble Reports								
MR-5-01	% Repeat Reports within 30 Days	Parity with VZ Retail	25.00	15.04	392	339		3.21	3.10

continued